

# **EXHIBIT 21**

## **Email from Plaintiff to Roman**

**RE: Final Paper**

Gregg Roman <Roman@meforum.org>

Tue 5/15/2018 10:37 AM

**To:** Lisa Barbounis <lisa.e.reynolds@gmail.com>

Very good job. Share with DP perhaps.

---

**From:** Lisa Barbounis <lisa.e.reynolds@gmail.com>

**Sent:** Tuesday, May 15, 2018 1:51 AM

**To:** Gregg Roman <Roman@meforum.org>

**Subject:** Fwd: Final Paper

>

**EXHIBIT 22**

**Message from  
Plaintiff to P.  
McNulty**

**2018-03-30 12:32:18 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:32:18 -0400

---

I'm going to punch Marnie and quit

**2018-03-30 12:32:47 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:32:47 -0400

---

Is she emailing you again?!?!

**2018-03-30 12:34:12 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:34:12 -0400

---

AT&amp;T

8:34 AM

90%



## Forward



barbounis@meforum.org

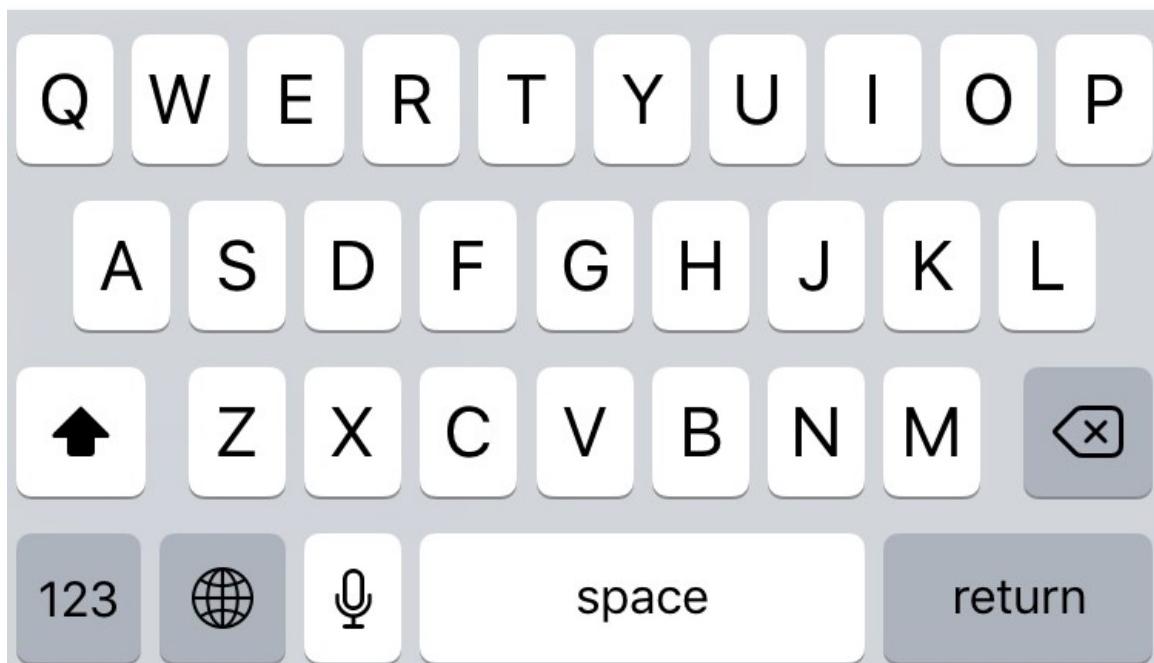
I don't have the minutes from last year and don't have this year completed. I taped it because Gregg didn't want me to type during the call. I was going to have Delaney transcribe it and Gregg said no. And Friday we/I did other tasks. I'm on the beach and won't be able to get to it until very late tonight. I can send you the recording if you need it.

|

Hi. Can you please send me the minutes for the ExComm meeting held in March 2017



Warm regards,



**2018-03-30 12:34:58 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:34:58 -0400

---

She sent me an email asking for minutes from last year when I wasn't here and for this year which I didn't do. FUCKING LOOK IN DROPBOX BITCH

**2018-03-30 12:35:14 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:35:14 -0400

---

I'm actively looking for a new job

**2018-03-30 12:35:22 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:35:22 -0400

---

I hate this type of work anyway

**2018-03-30 12:35:44 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:35:44 -0400

---

\_\_\_\_\_ don't even worry about that, it's not needed right this second, or this week, it's needed for the 16th

**2018-03-30 12:35:49 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:35:49 -0400

---

Waaaaaaaaah but meeeeeee

**2018-03-30 12:36:11 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:36:11 -0400

---

AT&T

8:36 AM

89%



o o o



Marnie Meyer

To You

8:33 AM

o o o

I just put it into Asana. I need both for the Audit. I cc'd Gregg so I'm hoping he'll send 2017 knowing you don't have it. I will need 2018 by the end of next week. Stay your ass on the beach.

Thanks,

**Marnie Meyer**  
**Director of Finance & Operations**  
Middle East Forum

---

**From:** Lisa Reynolds-Barbounis  
**Sent:** Friday, March 30, 2018 8:32 AM  
**To:** Marnie Meyer <[meyer@meforum.org](mailto:meyer@meforum.org)>  
**Cc:** Gregg Roman <[Roman@meforum.org](mailto:Roman@meforum.org)>  
**Subject:** Re: Excomm minutes

I don't have the minutes from last year and don't



Reply



**2018-03-30 12:36:33 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:36:33 -0400

---

She is in MAJA boss mode \_\_ she sent an email out yesterday about letting her know when we change schedules and that's cause Matt didn't come in yesterday and told me but not her

**2018-03-30 12:37:49 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:37:49 -0400

---

Yeah, stay your ass on the beach, don't mind her

**2018-03-30 12:38:56 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:38:56 -0400

---

—

**2018-03-30 12:57:59 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 30 Mar 2018 08:57:59 -0400

---

I know, she's on a power trip, don't let it get to you... Somebody get this girl a mimosa!!!!!!

# **EXHIBIT 23**

## **Message from Plaintiff to P. McNulty**

**2018-02-02 18:03:59 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:03:59 -0500

---

I've had it with Marnie. I do not trust her

**2018-02-02 18:05:22 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:05:22 -0500

---

I told her about the thing with Gregg and she went right to matt to see if he knew. Like why talk about it? I fucking told you it happened. But I can't say anything because it would throw matt under the bus

**2018-02-02 18:06:06 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:06:06 -0500

---

**2018-02-02 18:06:10 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:06:10 -0500

---

Yo. Agreed. And if you're gonna preach about how hr works...

**2018-02-02 18:06:23 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:06:23 -0500

---

EXACTLY.

**2018-02-02 18:08:02 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:08:02 -0500

---

I will never vent to her about a work thing ever again, or honestly even talk about the good.. no work talk with her. I feel like things get misconstrued or she goes straight to Gregg with it

**2018-02-02 18:08:14 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:08:14 -0500

---

I'm hot over here

**2018-02-02 18:09:36 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:09:36 -0500

---

Just learn from it and carry on, just sucks that you know you have to tip toe around works or topics with people

**2018-02-02 18:18:00 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:18:00 -0500

---

I have a bad habit of taking things as a direct assault

**2018-02-02 18:19:22 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Fri, 02 Feb 2018 13:19:22 -0500

---

Yeah, I know the feeling, haha.. but i would just take this as a live and learn experience, can't talk about everything with everyone and now you have a better idea of where those boundaries lie there

# **EXHIBIT 24**

## **Message from Plaintiff to P. McNulty**

## 2018-04-04 13:29:38 UTC: +12159102154@iMessage -> [3 recipients]

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Vasili Barbounis <"+1 215-439-1002">, Home <lisarey@sas.upenn.edu>  
**Date:** Wed, 04 Apr 2018 09:29:38 -0400

Except bitch Marnie got here at 7:30

# **EXHIBIT 25**

## **Messages**

### **between Plaintiff and P. McNulty**

**2018-04-09 15:26:46 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Mon, 09 Apr 2018 11:26:46 -0400

---

I was up so late last night working on this power point and accidentally deleted it. I actually cried. Vasili tried to get it back it didn't happen. I'm half way done. It's at 6 I'm thinking of ramping up my heart and taking a trip to the er to postpone. \_\_

**2018-04-09 15:26:53 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Mon, 09 Apr 2018 11:26:53 -0400

---

I know I'm insane

**2018-04-09 15:29:03 UTC: +1 609-742-1968 -> [+1 215-910-2154,  
lisarey@sas.upenn.edu]**

---

**From:** Tricia McNulty <"+1 609-742-1968">  
**To:** Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>  
**Date:** Mon, 09 Apr 2018 11:29:03 -0400

---

Hoooooolyyyy shittt.. ohmygod. How is it even possible it didn't automatically save, I would've cried too 😥 don't make your heart go crazy though!! You know if a trip to the Er would get you a get out of jail free card you could just go and SAY your heart was acting up

**2018-04-09 15:30:50 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Mon, 09 Apr 2018 11:30:50 -0400

---

My heart was insane last night. I thought I was going to die. Adderall, coffee, anxiety, anger. That's what gave me the idea

**2018-04-09 15:31:50 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Mon, 09 Apr 2018 11:31:50 -0400

---

If Gregg calls or emails today I may get fired or quit \_\_

**2018-04-09 15:32:00 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Mon, 09 Apr 2018 11:32:00 -0400

---

Not really but you get it

# **EXHIBIT 26**

## **Emails between**

## **Plaintiff and**

## **Roman**

## Re: From Matan Peleg

**Sent** Thu May 10, 2018 at 11:38AM UTC / Thu May 10, 2018 at 7:38AM EDT

**From** Lisa Barbounis <Barbounis@meforum.org>

**To** Gregg Roman <Roman@meforum.org>

**CC**

**BCC**

---

Can you answer the email about what day you prefer?

Honestly I haven't had any time. He emailed Thursday when you had me in the review all day. Friday I was home with my kids sick. Monday I was booking all the travel and doing the project directors and making sure everything was fine for DC. Then you tell me I'm going and I make last minute arrangements I then went to DC and ran around nonstop.

Was it necessary to cc everyone on a screenshot about me?

Get Outlook for iOS

From: Gregg Roman

Sent: Thursday, May 10, 2018 7:34:30 AM

To: Lisa Barbounis

Subject: Re: From Matan Peleg

Please do schedule now. It's your responsibility to follow up with me as well, if I don't respond. Please write to him now and the other outstanding requests since the work week is almost over there.

Gregg Roman

On May 10, 2018, at 7:17 AM, Lisa Barbounis wrote:

I asked you about Matan last week and you never answered me. You and I said we would go over the last of Israel today.

Get Outlook for iOS

From: Gregg Roman

Sent: Thursday, May 10, 2018 6:45:55 AM

To: Lisa Barbounis; Ashley Perry; Rachel Touitou

Subject: From Matan Peleg

I'm leaving tomorrow. Please ensure my schedule is maximally full.

**EXHIBIT 27**

**Affidavits of**

**Brett Goldman**

**and Jared**

**Geldner**

**Affidavit of Brett Goldman**

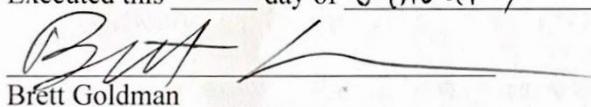
COMMONWEALTH OF KENTUCKY  
COUNTY OF FAYETTE

The undersigned, BRETT GOLDMAN, being duly sworn, hereby deposes and says:

1. I am over the age of 18 and am a resident of the Commonwealth of Pennsylvania. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
3. Please write in simple and complete sentences and limit each statement to only one or two main points. Also, make sure to write using the first person and use "I" statements. For example: "I have been the president of ABC, Inc. for the last 10 years." For tips on how to write statements of fact refer to the help provided.

I declare that, to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 15<sup>b</sup> day of January, 2020.



Brett Goldman

Sometime in the first half of 2018, Mr. Gregg Roman contacted me to ask if I would consider joining the board of a new nonprofit 501(c)(4) organization that he sought to create.

My interpretation of Mr. Roman's request was that I would be providing guidance and advice on the formation and steering of the proposed organization that would operate in the nonprofit advocacy space. To the best of my recollection, the 501(c)(4) would work to counter the influence of Islamic extremism in the West.

Since I had previously worked on the formation of nonprofit organizations, issue advocacy campaigns, and political advocacy, I believed that Mr. Roman thought I had some insight to share on how to do this, but it was not stated explicitly by Mr. Roman.

Ultimately, I did not move forward with this request as I was in the process of changing jobs and was not able to take on that type of commitment.

At some point after he asked me to join the board, Mr. Roman informed me that he would no longer be forming this organization and that he would continue to work in his existing role at the Middle East Forum.

**NOTARY ACKNOWLEDGEMENT**

COMMONWEALTH OF KENTUCKY, COUNTY OF Fayette, ss:

This Affidavit was acknowledged before me on this 15<sup>th</sup> day of January, 2020 by Brett Goldman, who, being first duly sworn on oath according to law, deposes and says that he/she has read the foregoing Affidavit subscribed by him/her, and that the matters stated herein are true to the best of his/her information, knowledge and belief.

Laura A. Taylor  
Notary Public  
Notary Public  
Title (and Rank)

My commission expires March 19, 2023



Laura A. Taylor  
NOTARY PUBLIC  
State at Large, Kentucky  
ID # 619595  
My Commission Expires  
March 19, 2023

### Affidavit of Jarad Geldner

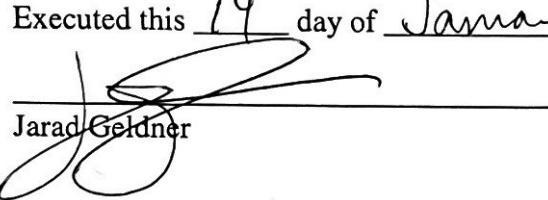
DISTRICT OF COLUMBIA  
COUNTY OF WASHINGTON

The undersigned, JARAD GELDNER, being duly sworn, hereby deposes and says:

1. I am over the age of 18 and am a resident of the State of Maryland. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
3. Please write in simple and complete sentences and limit each statement to only one or two main points. Also, make sure to write using the first person and use "I" statements. For example: "I have been the president of ABC, Inc. for the last 10 years." For tips on how to write statements of fact refer to the help provided.

I declare that, to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 14 day of January, 2020.

  
\_\_\_\_\_  
Jarad Geldner

Sometime in early to mid 2018, Gregg Roman called me to ask if I would consider joining the board of a nonprofit 501(c)(4) organization he intended to create.

My interpretation of the request was that Mr. Roman wanted me to provide guidance and advice on forming and steering an organization that operates in the nonprofit advocacy space. To the best of my recollection, the 501(c)(4) organization was intended to work towards countering the influence of extremist viewpoints in the West.

Since I had previously worked to form and grow a reasonably noteworthy Democratic Super PAC, I believed he thought I had some insight to share on how to do this, but Mr. Roman did not state this explicitly.

I never provided a response to Mr. Roman, as I had recently started a new job and wasn't sure whom I needed to ask for permission to make such an agreement.

At some point after he asked me to join the board, Mr. Roman informed me that he would no longer be forming this organization and that he would continue to work in his existing role at Middle East Forum.

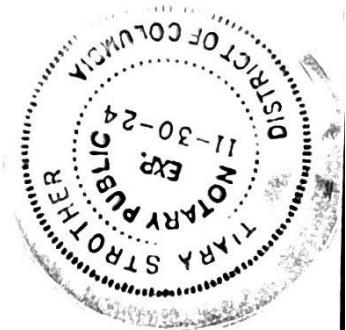
#### NOTARY ACKNOWLEDGEMENT

DISTRICT OF COLUMBIA, ss:

This Affidavit was acknowledged before me on this 14<sup>th</sup> day of January, 2020, by Jarad Geldner, who, being first duly sworn on oath according to law, deposes and says that he/she has read the foregoing Affidavit subscribed by him/her, and that the matters stated herein are true to the best of his/her information, knowledge and belief.

  
Notary Public  
Notary Public - DC  
Title (and Rank)

My commission expires 30 Nov 2024



# **EXHIBIT 28**

# **Draft Articles of**

# **Incorporation**

**ARTICLES OF INCORPORATION**  
*of*  
**[INSERT NAME]**

TO: Department of Consumer and Regulatory Affairs  
District of Columbia Government  
Corporations Division

The undersigned, acting as the Incorporator of a nonprofit corporation under the provisions of the District of Columbia Business Organizations Code (D.C. Code, Title 29) (the “Act”), adopts the following Articles of Incorporation:

FIRST: The name of the Corporation is [Insert Name] (the “Corporation”).

SECOND: The Corporation is incorporated as a nonprofit corporation under D.C. Code, Title 29, Chapter 4.

THIRD: The period of the Corporation’s duration is perpetual.

FOURTH: The Corporation is organized as a social welfare organization within the meaning of Section 501(c)(4) of the Internal Revenue Code of 1986, as now in effect or as hereafter may be amended (the “Code”). In furtherance of its exclusive corporate purposes, the Corporation shall have all the general powers enumerated in Section 29-403.02 of the Act as now in effect or as may hereafter be amended, together with the power to solicit grants and contributions for such purposes, except as the same may be limited by Section 501(c)(4) of the Code.

FIFTH: The Corporation is not authorized to issue shares of stock.

SIXTH: The Corporation shall have members. The members shall have such classes and such voting rights as set forth in the Corporation’s Bylaws.

SEVENTH: The powers of the Corporation shall be exercised, and its affairs conducted, by a board of directors of the Corporation (the “Board of Directors”) who shall be elected by the existing Board of Directors in the manner provided for from time to time in the Bylaws of the Corporation. The number of directors may be increased or decreased pursuant to the Bylaws of the Corporation, but shall not be less than the minimum number of directors required by law.

EIGHTH: Provisions for the regulation of the internal affairs of the Corporation, including provisions for distribution of assets on dissolution or final liquidation are as follows:

A. No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to, any director or officer of the Corporation or any other private individual, except that the Corporation shall be authorized and empowered to pay reasonable compensation for

services rendered to or for the Corporation and to make payments and distributions in furtherance of its purposes as described herein.

B. Notwithstanding any other provisions of this Certificate of Incorporation, the Corporation shall not directly or indirectly carry on any activity which would prevent it from obtaining exemption from Federal income taxation as a corporation described in Section 501(c)(4) of the Code, or cause it to lose such exempt status.

C. In the event of dissolution or final liquidation of the Corporation, the remaining assets of the Corporation shall, after paying or making provision for the payment of all of the liabilities and obligations of the Corporation, be distributed as the Board of Directors shall determine and in accordance with applicable law and regulations.

D. To the fullest extent permitted by the Act, as now in effect or as may hereafter be amended, no officer or director of the Corporation shall be personally liable to the Corporation for monetary damages for any breach of fiduciary duty as an officer or director of the Corporation; provided, however, that such relief from liability shall not apply in any instance where such relief is inconsistent with applicable law. Subject to the provisions of the Bylaws, the Corporation shall indemnify any officer, director, or agent of the Corporation to the fullest extent permitted by and in accordance with the Act.

NINTH: The address, including street and number, of the initial registered office of the Corporation is 1025 Vermont Avenue, NW, Suite 1130, Washington, DC 20005, and the name of its initial registered agent at such address is COGENCY GLOBAL INC.

TENTH: The name and address of the incorporator are as follows:

<i>Name</i>	<i>Address</i>
Thomas W. Antonucci	c/o Wiley Rein LLP 1776 K Street NW Washington, DC 20006

Dated: February \_\_, 2019

[SIGNATURE PAGE FOLLOWS]

4825-1845-4664.1

**SIGNATURE PAGE TO  
ARTICLES OF INCORPORATION**  
*of*  
**[INSERT NAME]**

IN WITNESS WHEREOF, the undersigned has executed these Articles of Incorporation as of the date set forth above.

---

Thomas W. Antonucci, Incorporator

# **EXHIBIT 29**

# **Meeting Notes**

Project Directors Meeting  
11/20/2017

**All Directors:**

1. Each director needs press release entries. Due Wednesday morning at 10:00am send to Marc and put into the Dropbox folder he created
2. If anyone asks about the antidefamation case do not comment. Doesn't involve MEF directly we funded them. If they press send them to Gregg
3. Any conversation about PAC or 501c4 can't be done on MEF email. No campaign finance on MEF emails
4. Update meeting lists
5. Marc gets cc/updated on anything with substance
6. Gregg wants all to act as agents of our ideas and to facilitate media connections
7. If anyone needs posting training for the new website, please email Gregg

**EJ:**

1. IVP CIVC Mini Report
2. **Follow up IVP events**
3. **10 Members to target by the end of the year**
4. **Get CIVC Members to 50**
5. Met with State Dept. advisor to Nicki Haley
  - a. Haley supports the Idea
  - b. Carey off the record – Haley viewpoints are aligned with IVP
  - c. Talked about event at UN or private lunch to move the envelope
  - d. Also spoke about UNRWA
6. **Ask Nicki Haley's aide if Paul Singer would be willing to fund this, just looking for an expression of interest**
7. **Get all the Members on the caucus to sign the declaration**
8. **Convert declaration into a resolution, or**
9. **Principles converted into a letter to President Trump**
10. **Work with Sam to get info to Rep. Pittenger**
  - a. Interested in using IR dossier for hearing or Congressional inquiry
  - b. Mobry got the appointment
  - c. EJ has good relations with Rep. Pittenger's office
  - d. EJ to be the go between Sam and Rep. Pittenger delivering this information
  - e. EJ meet with Rep. Pittenger's COS
  - f. EJ get briefing from Sam and Executive summary for Rep. Pittenger
11. **EJ send numbers to Marnie for check**
12. **Cliff and EJ coordinate event with Quilliam in DC**

**Cliff:**

1. Attending Islamism and work place conference in Paris
2. Gave a speech that was well received which was filmed
  - a. **Give Gary, Sam, and Marc a copy of the video clip**
3. FOIA update - DHS gave us some documents and we filed litigation
  - a. **Sue them. File more docs and briefs.**
    - b. It is going to be a while before we see results
4. Kirk language to be put on State Dept. website - Follow up after TG State Dept. See if this request was fulfilled check with Kredo
5. Gregg met with Senator Todd Young and needs the following when Cliff returns from vacation

- a. Any language incorporated for the continuing relations from last year
- b. 6 questions UNRWA and interest in US
- c. Amendment Cliff asked to get through Conference
- d. In one doc 1,2,3
- 6. In touch with John on Vetting working on stuff and contracting Member offices
- 7. Council on sub-committee border security
- 8. Only contacting Members that are considering introducing the bill
- 9. **Cliff and EJ coordinate event with Quilliam in DC**

**Sam:**

- 1. Turkey Campaign
- 2. Islamic Relief Dossier being published by December
- 3. Criminal investigation please cc Cliff and Marc
- 4. Gary sent the copy edit
- 5. **Get one last unbiased fact check on dossier**
  - a. Run names by Gregg first
  - b. Maybe Jeff from Boston Globe, or
  - c. DP editor from the Washington Examiner
  - d. Maybe send to outside council
- 6. **Marc sign off after he returns**
- 7. **Get info to Rep. Pittenger**
  - a. Interested in using IR dossier for hearing or congressional inquiry
  - b. Mobry got the appointment
  - c. EJ has good relations with the office
  - d. EJ to be the go between Sam and Rep. Pittenger delivering this information.
  - e. EJ meet with Rep. Pittenger's COS
  - f. EJ get briefing from Sam and create an executive summary for Rep. Pittenger
- 8. Daniel wants a national search for CIN instead of inhouse
  - a. Coordinator not to work at MEF acting autonomously with no direct report just supervision
  - b. Job description in proposal
  - c. Most Qualified person to be CEO of CIN which will be an organization on its own
  - d. 200k for the first year followed by 150k in the second year and 100k in the third
  - e. Manage own money
  - f. MEF money
  - g. Call for applications
  - h. MEF hiring committee
    - i. Separate entity – temporarily use our 501c
    - j. Incubate at MEF and then let it go
    - k. Otherwise we must raise 200k to reach our objective
- 9. Counter Islamic Network
  - a. 12k each/1k per month for op-eds
  - b. Not part of IW
- 10. Got an URDU guy. Someone has translated for us.
- 11. Big Pakistan event making us friends in moderate Muslim circles
- 12. Oren sent a proposal for a Journal on Islamism

**Winfield:**

- 1. Title VI joint statement
- 2. House may introduce an education reauthorization before the end of the year
- 3. Georgetown

- a. No update
- 4. SFSU
  - a. Waiting for Georgetown
- 5. Mitchell barn
- 6. Andrews attending another event for us

**Garry:**

- 1. IR copy edit
- 2. Nothing big to report
- 3. Get Marc reporting requirements**
- 4. Update meetings**

**Marc:**

- 1. Send a note to DP**
- 2. Marc get copied on every substance related issue

**Ashley:**

- 1. Get all reports from Eli, Alex, and Ashley**
- 2. Ashley send to Eman missing TV, radio and social media**
- 3. Alex said they are doing a lot of follow up with Russian media and media in general

**Gregg:**

- 1. Review due Wednesday**
- 2. Review Mickey and Mida**
  - a. Ashley will send the info to set up the meeting
- 3. IVP ideas in Knesset
- 4. Palestinian involvement in academic institutions
- 5. Send Michael Lewis mailing list to EJ, Cliff, Lisa, Winfield**

**Lisa:**

- 1. Schedule Gary meeting in the office 1-2 pm for Dec 28<sup>th</sup> DP and GR**

**Sam, Cliff, EJ:**

- 1. Mike McCall meeting (Mobry)**
- 2. EJ check for Congressional Fellow on Islamism that would be in a Member's office**
- 3. EJ to share proposal of what the position is and description for Donors**
- 4. Fellow to be the Congressional avenue on Islamist task force.**

# **EXHIBIT 30**

## **Email from**

## **Plaintiff to**

## **Roman**

 LB  
○ Lisa Barbounis <Barbounis@meforum.org>

Thursday, July 12, 2018 at 1:33 PM

To: ✉ Gregg Roman ☰

▶ This message is flagged for follow up.

For Wiley Rein we need:

**The new org Mailing Address.****Director(s).** Name of the initial directors (if incorporated in Pennsylvania, need to have 1; if in DC, for example, would need to have at least 3 directors).**Officers.** Name and title of the initial officers – need a **president, secretary and treasurer**; can have others.**SSN.** We will need to list the social security number of one of the officers on the EIN Application.**Activities/Financials.** If MEFA does apply for tax-exemption (IRS Form 1024), we will need to include detailed description of the organization's proposed activities, and a budget of revenues/expenses for the next three years (and a current balance sheet) in the application.**Corporate Policies.** Let me know which policies MEFA would like to adopt, as described above.

Sincerely,

**Lisa Barbounis**

Executive Liaison

[Middle East Forum](#)

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409



Please subscribe to our newsletters [here!](#)

# **EXHIBIT 31**

## **Email from**

## **Plaintiff to A.**

# **Morgenstern**

**Subject:** FW: Middle East Forum Action  
**Date:** Thursday, July 26, 2018 at 1:21:38 PM Eastern Daylight Time  
**From:** Lisa Barbounis  
**To:** ari morgenstern  
**CC:** Gregg Roman  
**Priority:** High  
**Attachments:** image001.jpg, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, image008.png, image010.jpg, image012.png, image014.png, image016.png, image018.png, image020.png, Middle East Forum Action.eml

Hi Ari and Gregg,

So I am supposed to be collecting the documents for MEFA. But I think you and Gregg will need to discuss some of this and I will compile: Below is the list of things I need with my questions and the original email.

Thanks!

- A. **Mailing Address.** – Will this be based in DC or Philly? What address are you planning to use?
- B. **Director(s).** Name of the initial directors (if incorporated in Pennsylvania, need to have 1; if in DC, for example, would need to have at least 3 directors).
- C. **Officers.** Name and title of the initial officers – need a **president, secretary and treasurer**; can have others.
- D. **SSN.** We will need to list the social security number of one of the officers on the EIN Application.
- E. **Activities/Financials.** If MEFA does apply for tax-exemption (IRS Form 1024), we will need to include detailed description of the organization's proposed activities, and a budget of revenues/expenses for the next three years (and a current balance sheet) in the application.
- F. **Corporate Policies.** Let me know which policies MEFA would like to adopt, as described above. (in this case its below)

Gregg and EJ – it was nice to meet with you last week. Following up on our discussion, we can begin the process of establishing "Middle East Forum Action" (MEFA) as a 501(c)(4) organization.

A threshold question is in which state the c4 would like to incorporate. FYI, Middle East Forum is incorporated in Pennsylvania; MEFA could incorporate there as well to maintain consistency of operations (especially if the organization will have physical presence in PA, since it would be required to qualify in PA in such a case). If MEFA will have its main office somewhere else, or if you have questions or would like to discuss this, please let me know.

Regardless of the state, below are the documents (and information needed) to organize MEFA:

1. Articles of Incorporation – to be filed with the relevant state corporate authority.
2. Bylaws
3. Organizational Resolutions of the Board – to adopt bylaws, corporate policies, appoint officers, etc.
  - a. Note: if the initial directors are known and named in the Articles of Incorporation, then we would have one set of organizational resolutions. If the initial directors are not known or named in the Articles, then we would have two sets of resolutions: an "incorporator" resolution to appoint the initial board once they are known, and then a second "board" resolution to take other organizational actions.

4. Corporate Policies – the organization should adopt at least a conflict of interest policy, and potentially other corporate policies such as a whistleblower policy, a document retention policy, and a compensation policy. I note that Middle East Forum reports that it has these policies in place, and MEFA could adopt similar policies.
5. EIN Application (IRS Form SS-4) – to obtain an employer identification number (tax ID) for the organization.
6. Notice of Intent to Operate as a 501(c)(4) (IRS Form 8976) – to be filed electronically within 60 days of formation.
7. Tax-Exempt Application (IRS Form 1024) – we had discussed whether the organization would apply for formal tax-exempt recognition from the IRS. It is not mandatory for a social welfare organization to apply; it instead can “self-declare” as a tax-exempt association under Section 501(c)(4). As we discussed, I believe that the upside of applying (certainty of tax-exempt status) outweighs the downside (cost), but let me know if you would like to discuss that point further. In either case, the organization will need to file annual tax information returns (IRS Form 990).

In order to prepare these documents, we need the following information:

- G. **Mailing Address.**
- H. **Director(s).** Name of the initial directors (if incorporated in Pennsylvania, need to have 1; if in DC, for example, would need to have at least 3 directors).
- I. **Officers.** Name and title of the initial officers – need a **president, secretary and treasurer**; can have others.
- J. **SSN.** We will need to list the social security number of one of the officers on the EIN Application.
- K. **Activities/Financials.** If MEFA does apply for tax-exemption (IRS Form 1024), we will need to include detailed description of the organization’s proposed activities, and a budget of revenues/expenses for the next three years (and a current balance sheet) in the application.
- L. **Corporate Policies.** Let me know which policies MEFA would like to adopt, as described above.

Note that if MEFA will have paid employees, it likely will need to register with the state/local taxing authorities for payroll/withholding taxes. If needed, that is typically handled by the organization’s accountant; but let me know if you have questions on that.

Sincerely,

**Lisa Barbounis**  
Executive Liaison  
Middle East Forum  
O: 215.546.5406 x102  
C: 215.910.2154  
F: 215.546.5409



Please subscribe to our newsletters [here!](#)

**EXHIBIT 32**  
**Barbounis Dep.**  
**In O'Brien v.**  
**MEF at p.20**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

MARNIE O'BRIEN, :  
:  
Plaintiff, :  
:  
v. : C.A. No.  
: 19-06078 JMG  
MIDDLE EAST FORUM, :  
DANIEL PIPES :  
(individually), and :  
GREGG ROMAN :  
(individually), :  
:  
Defendants. :  

---

:  
GREGG ROMAN, :  
:  
Counterclaim and :  
Third-Party :  
Plaintiff, :  
:  
v. :  
:  
MARNIE O'BRIEN, :  
:  
Counterclaim :  
Defendant. :  
- - -

WILCOX & FETZER  
Registered Professional Reporters  
1330 King Street  
Wilmington, Delaware 19801  
(302) 655-0477

1 Videotaped deposition of LISA  
2 REYNOLDS BARBOUNIS taken via remote  
3 videoconferencing of all participants  
4 beginning at 9:44 a.m., on Friday,  
5 January 8, 2021, before Gloria M.  
6 D'Amore, Registered Professional Reporter  
7 and Notary Public.

## 10 APPEARANCES:

12 ERICA A. SHIKUNOV, ESQUIRE  
13 DEREK SMITH LAW GROUP, PLLC  
14 1835 Market Street - Suite 2950  
15 Philadelphia, Pennsylvania 19103  
erica@dereksmithlaw.com  
(215)-391-4790  
For the Plaintiff, Marnie O'Brien  
and Counterclaim Defendant,  
Marnie O'Brien

18 SETH D. CARSON, ESQUIRE  
19 DEREK SMITH LAW GROUP, PLLC  
20 1835 Market Street - Suite 2950  
Philadelphia, Pennsylvania 19103  
seth@dereksmithlaw.com  
(215)-391-4790  
For Lisa Reynolds Barbounis

**LISA REYNOLDS BARBOUNIS**

20

1 my mind, like, oh, Marnie was bad with  
2 payroll. Like, no.

3 Q. Okay. And in February of 2018,  
4 you did not like Ms. O'Brien.

5 Would that be correct?

6 A. It was always -- it was always a  
7 love-hate relationship with Marnie.

8 There -- there were parts of Marnie  
9 that, like, I really liked. I admired.  
10 She was cool and pretty and smart.

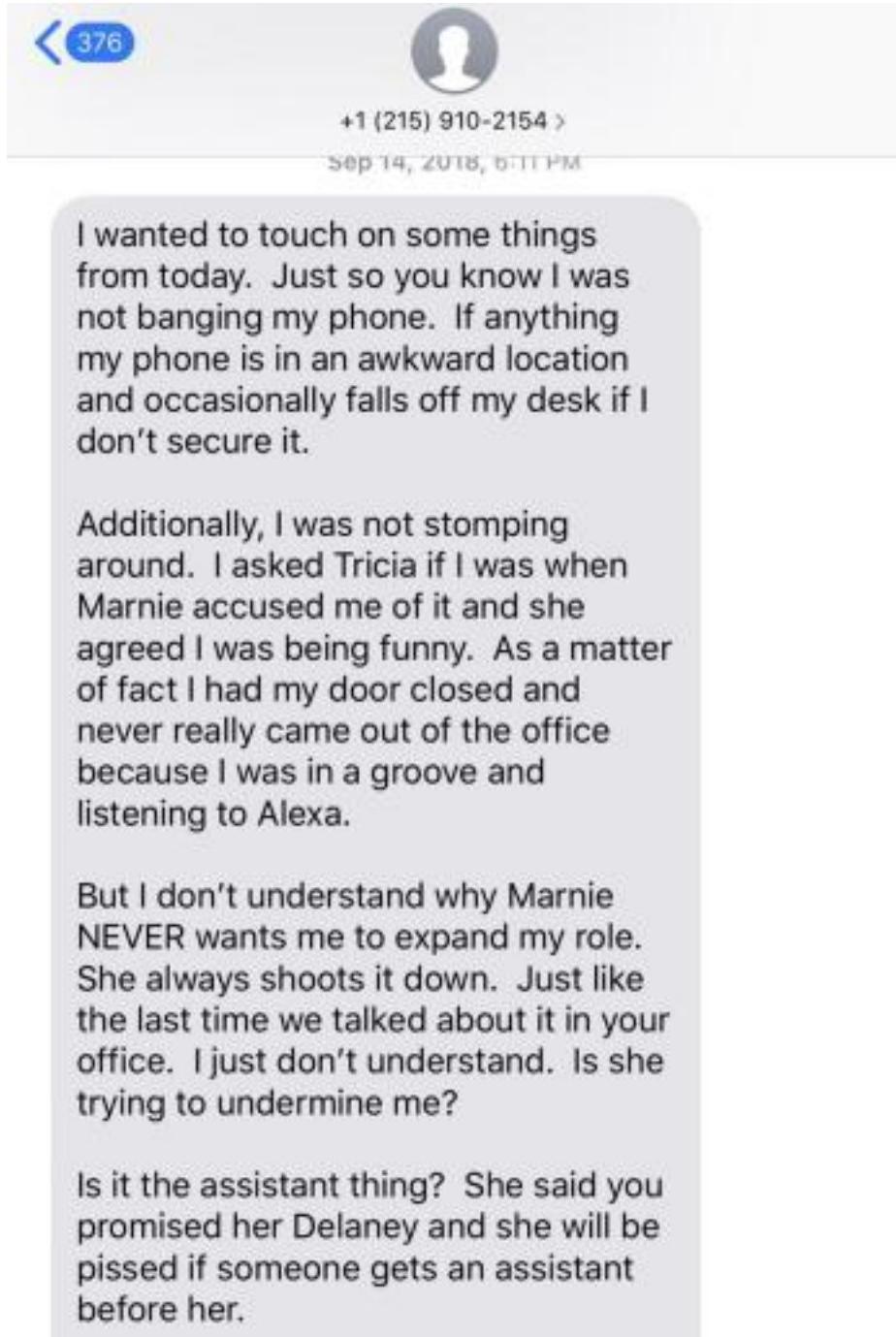
11 And, you know, she -- she was -- there  
12 were parts that I liked. And I wanted  
13 to, like, be cool with Marnie.

14 And, then, there were other  
15 times where I couldn't stand her. I'm  
16 not going to lie. Do you know what I  
17 mean? Like, that was true. But that  
18 wasn't really her fault, like, in -- in  
19 hindsight. It was Gregg pitting us  
20 against each other like he always did.

21 So, no, I -- I don't want to  
22 say that, like, I didn't -- I hated  
23 her, or I didn't like her. That's very  
24 much true at some certain points. But

# **EXHIBIT 33**

## **Message from Plaintiff to Roman**



# **EXHIBIT 34**

## **Message from Plaintiff to J. Reynolds**

From: +12159102154 Me (owner)

Either way if I owe the IRS that money I'll have to pay them

Status: Sent

Delivered: 8/7/2018 3:48:29 PM(UTC-4)

8/7/2018 3:48:27 PM(UTC-4)

From: +12159102154 Me (owner)

Never mind

Status: Sent

Delivered: 8/7/2018 3:48:42 PM(UTC-4)

8/7/2018 3:48:41 PM(UTC-4)

From: +12159102154 Me (owner)

Unless it's the house. I got t

Status: Sent

Delivered: 8/7/2018 3:48:51 PM(UTC-4)

8/7/2018 3:48:50 PM(UTC-4)

From: +18562871436 Jane Reynolds

Don't worry I live a long life and use all my money on a nursing home! Noooooo kill me first

Status: Read

Read: 8/7/2018 3:51:19 PM(UTC-4)

8/7/2018 3:51:13 PM(UTC-4)

From: +12159102154 Me (owner)

The state department called and wanted a policy plan put together for dismantling UNRWA in a matter of hours. I did most of it. Gregg put my name on it too and it's going to Pompeo's desk!!!!!!

Status: Sent

Delivered: 8/9/2018 3:02:26 PM(UTC-4)

8/9/2018 3:02:24 PM(UTC-4)

From: +18562871436 Jane Reynolds

Wow I

Status: Read

Read: 8/9/2018 3:24:22 PM(UTC-4)

8/9/2018 3:03:07 PM(UTC-4)

**EXHIBIT 35**

**Message from**

**Plaintiff to T.**

**McNulty**



+1 (215) 910-2154 >

Is it the assistant thing? She said you promised her Delaney and she will be pissed if someone gets an assistant before her.

Her and I have been getting along pretty well, or so I thought, so I'm rather shocked to hear she was shooting down having my role modified.

you are my boss and she is HR. How is it that she gets to make performance judgments? I know we are a small place but we need structure.

I want to make my time here successful for both me and MEF. I want to live up to my potential. I know you can help me achieve that. How can we fix this?

Lastly, everyone in here loves me, Tricia, Delaney, Matt, Thelma. Cliff, Sam and EJ all love me. No one else has a problem with me or my "attitude".

# **EXHIBIT 36**

# **Message from M.**

# **O'Brien to Roman**

**Subject:** RE: Weekly Schedule

**Date:** Saturday, September 15, 2018 at 12:57:00 PM Eastern Daylight Time

**From:** Marnie Meyer

**To:** Gregg Roman

**Attachments:** image013.jpg, image014.png, image015.png, image016.png, image017.png, image018.png

Because I didn't have my schedule in. She said she wasn't sending it because Matt and I never give her our schedules. (Not true, I've been pretty good about it not perfect but pretty good)

I said that it was BS. It was her responsibility and she needed to see that it was completed and if Matt and I don't send it in she should chase it down or leave us blank and let us deal with it.

And she was completely hostile the entire time she was in my office. I know it will blow over and we will be fine but I'd like to discuss that whole situation further with you and without emotion.

Sent from my Verizon 4G LTE smartphone

----- Original message -----

From: Gregg Roman <Roman@meforum.org>

Date: 9/14/18 6:29 PM (GMT-05:00)

To: Marnie Meyer <meyer@meforum.org>

Subject: Fwd: Weekly Schedule

Why didn't she include you?

Gregg Roman

Begin forwarded message:

**From:** Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)>

**Date:** September 14, 2018 at 5:24:12 PM EDT

**To:** Gregg Roman <[Roman@meforum.org](mailto:Roman@meforum.org)>, Matthew Bennett <[Bennett@meforum.org](mailto:Bennett@meforum.org)>, Marnie Meyer

<[meyer@meforum.org](mailto:meyer@meforum.org)>, Tricia McNulty <[McNulty@meforum.org](mailto:McNulty@meforum.org)>, Tricia McNulty

<[McNulty@meforum.org](mailto:McNulty@meforum.org)>, Caitríona Brady <[brady@meforum.org](mailto:brady@meforum.org)>, Thelma Prosser

<[prosser@meforum.org](mailto:prosser@meforum.org)>, Stacey Roman <[Stacey@meforum.org](mailto:Stacey@meforum.org)>

**Subject: Weekly Schedule**

DP is in the office on Tuesday. Matt and Gregg will be out on Wednesday

OFFICE STAFF WEEKLY SCHEDULE September 17-21					
	<u>17</u> <u>Monday</u>	<u>18</u> <u>Tuesday</u>	<u>19</u> <u>Wednesday</u>	<u>20</u> <u>Thursday</u>	<u>21</u> <u>Friday</u>
<u>DP</u>		IN OFFICE			
<u>Gregg</u>	OFFICE	OFFICE until 2	OFF	OFFICE	OFFICE
<u>Delaney</u>	9:00-5:00PM	9:00-5:00PM	9:00-5:00PM	9:00-5:00PM	7:00-3:00PM
<u>Marnie</u>					
<u>Matt</u>	10:00-6:00PM	10:00-6:00PM	OFF	10:00-6:00PM	10:00-6:00PM
<u>Stacey</u>	8:30-4:30PM	8:30-4:30PM	8:30-4:30PM	8:00-4:00PM	8:30-4:30PM
<u>Thelma</u>	OFF	8:00-4:00PM	8:00-4:00PM	8:00-4:00PM	OFF

<i>Tricia</i>	8:30-4:30PM	8:30-4:30PM	8:30-4:30PM	8:30-4:30PM	8:00-2:00PM
<i>Lisa</i>	8:30-4:30PM	9:00-5:00PM	8:00-4:00PM	9:30-5:30PM	9:30-5:30PM
<i>Caitríona</i>	8:30-4:30PM	8:30-4:30PM	8:30-4:30PM	8:30-4:30PM	7:00-3:00PM

Sincerely,

**Lisa Barbounis**

Executive Liaison

[Middle East Forum](#)

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409



Please subscribe to our newsletters [here!](#)

# **EXHIBIT 37**

# **Message from**

# **Plaintiff to T.**

# **McNulty**

From: +12159102154 Me (owner)

I'm sending emails to DP and Gregg high as shit

Status: Sent

Delivered: 9/26/2018 8:54:26 PM(UTC-4)

9/26/2018 8:54:26 PM(UTC-4)

From: +12159102154 Me (owner)

My back doesn't hurt

Status: Sent

Delivered: 9/26/2018 8:54:43 PM(UTC-4)

9/26/2018 8:54:43 PM(UTC-4)

From: +16097421968 Tricia McNulty

Well that's good at least!! Gotta love dem good good drugs

Status: Read

Read: 9/26/2018 8:55:17 PM(UTC-4)

9/26/2018 8:55:11 PM(UTC-4)

# **EXHIBIT 38**

## **Message from Plaintiff to V. Barbounis**

From: +12159102154 Me (owner)

I Planned the whole entire Tommy thing in London. I invited tricia because I wanted company. Now the president thinks both of us planned it. But it's mine. Now we are doing another event and he included her in the email. So I responded with my ideas and took her off the chain because she didn't do a thing with the first 2!!!! I told her about my suggestions to see if they were good and then she goes back to her office and sends this.....

I was somehow taken off the email Lisa just sent but she did tell me about it. I think it is a great idea to make this more structured as she mentioned. I also think in addition to an on-stage interview with Tommy, we could make this more in line with a how a press conference would run rather than a rally, and take some questions from journalists who are there (pre-screened and planned would probably be best).

**Status:** Sent

**Delivered:** 10/4/2018 2:00:10 PM(UTC-4)

10/4/2018 2:00:10 PM(UTC-4)

From: +12159102154 Me (owner)

I'm pissed

**Status:** Sent

**Delivered:** 10/4/2018 2:00:15 PM(UTC-4)

10/4/2018 2:00:20 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Babe this is corporate life, try to keep it cool. It's your project, everyone else knows it. Remember She loved being part of the ride (bc of you) and the most important person in you company asked for her opinion, so it's natural that she wants to be heard and included on the coolest project. Be the leader and gracious and when it's time to take credit (not on an email string) do so. Greg also knows who is to credit even though he also likes to claim it was him

**Status:** Read

**Read:** 10/4/2018 2:10:02 PM(UTC-4)

10/4/2018 2:09:52 PM(UTC-4)

From: +12154391002 Vasili Barbounis

She's your friend. That's more important

**Status:** Read

**Read:** 10/4/2018 2:10:19 PM(UTC-4)

10/4/2018 2:10:13 PM(UTC-4)

From: +12159102154 Me (owner)

She's lucky I brought her ass to London

**Status:** Sent

**Delivered:** 10/4/2018 2:10:15 PM(UTC-4)

10/4/2018 2:10:20 PM(UTC-4)

From: +12159102154 Me (owner)

He didn't ask for her opinion.

**Status:** Sent

**Delivered:** 10/4/2018 2:10:39 PM(UTC-4)

10/4/2018 2:10:39 PM(UTC-4)

From: +12159102154 Me (owner)

He said maybe we should conceptualize it first. I thought I would take the reigns because it was my project and responded. If she would have been included on the email I wrote most of that in there. This is mine and she needs to back off.

Status: Sent

Delivered: 10/4/2018 2:12:06 PM(UTC-4)

10/4/2018 2:12:05 PM(UTC-4)

From: +12154391002 Vasili Barbounis

I don't know how to advise you on this one. She may already be crying

Status: Read

Read: 10/4/2018 2:14:09 PM(UTC-4)

10/4/2018 2:13:27 PM(UTC-4)

From: +12159102154 Me (owner)

She doesn't know I'm mad

Status: Sent

Delivered: 10/4/2018 2:14:13 PM(UTC-4)

10/4/2018 2:14:13 PM(UTC-4)

From: +12159102154 Me (owner)

She has no clue I'm still being super nice while holding in my lisa rage

Status: Sent

Delivered: 10/4/2018 2:14:38 PM(UTC-4)

10/4/2018 2:14:37 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Hopefully it will pass. Just make it happen and hopefully Tommy will communicate you are his point person

Status: Read

Read: 10/4/2018 2:18:21 PM(UTC-4)

10/4/2018 2:16:03 PM(UTC-4)

From: +12159102154 Me (owner)

He's only communicating with me

Status: Sent

Delivered: 10/4/2018 2:18:43 PM(UTC-4)

10/4/2018 2:18:42 PM(UTC-4)

From: +12159102154 Me (owner)

No one else

Status: Sent

Delivered: 10/4/2018 2:18:46 PM(UTC-4)

10/4/2018 2:18:46 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Good

Status: Read

Read: 10/4/2018 2:21:06 PM(UTC-4)

10/4/2018 2:19:08 PM(UTC-4)

From: +12159102154 Me (owner)

But Daniel doesn't know I do anything

**Status:** Sent

**Delivered:** 10/4/2018 2:21:18 PM(UTC-4)

10/4/2018 2:21:23 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Well it may be time that he knows

**Status:** Read

**Read:** 10/4/2018 3:09:12 PM(UTC-4)

10/4/2018 2:37:11 PM(UTC-4)

From: +12159102154 Me (owner)

That's what I'm saying. It was my moment to shine

**Status:** Sent

**Delivered:** 10/4/2018 3:09:22 PM(UTC-4)

10/4/2018 3:09:21 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Be patient, you don't need to worry about Trish but rather Gregg

**Status:** Read

**Read:** 10/4/2018 3:30:21 PM(UTC-4)

10/4/2018 3:11:37 PM(UTC-4)

From: +12159102154 Me (owner)

Don't forget my hospital record CD

**Status:** Sent

**Delivered:** 10/4/2018 4:36:11 PM(UTC-4)

10/4/2018 4:36:17 PM(UTC-4)

From: +12159102154 Me (owner)

You still coming over tonight

**Status:** Sent

**Delivered:** 10/4/2018 4:42:58 PM(UTC-4)

10/4/2018 4:43:03 PM(UTC-4)

From: +12159102154 Me (owner)

Don't forget my hospital record CD

**Status:** Sent

**Delivered:** 10/4/2018 6:07:12 PM(UTC-4)

10/4/2018 6:07:12 PM(UTC-4)

From: +12154391002 Vasili Barbounis

I won't, i got a bunch of calls right before six so i need to send emails before leaving. I will get hospital record and groceries

**Status:** Read

**Read:** 10/4/2018 6:11:31 PM(UTC-4)

10/4/2018 6:08:10 PM(UTC-4)

# **EXHIBIT 39**

## **Message from Plaintiff to M. O'Brien**

372



+1 (856) 803-8401 >

Tue, Oct 16, 3:00 PM

This is just Gregg

No Lisa here

What am I going to do with her?

I get the mixup but I got messages yesterday from donors that she didn't respond to phone calls they made asking for meetings with me.

Save the messages. Probably need to have a discussion

Matt's birthday is this weekend. What day do you wanna do cake

Today

Fuck. Ok

Can't do it today. He's out sick. Pick another day

# **EXHIBIT 40**

## **Message from Plaintiff to Roman**

**Subject:** Today

**Date:** Tuesday, October 30, 2018 at 4:47:29 PM Eastern Daylight Time

**From:** Lisa Barbounis

**To:** Gregg Roman

**Attachments:** image013.jpg, image014.png, image015.png, image016.png, image017.png, image018.png

Gregg,

In response to what happened today I wanted to let you know what has transpired and how I am feeling. I took this job because I was told it was flexible and there was a great culture here. What has transpired over the last year has been anything but. I am constantly monitored and micromanaged.

Today around noon I was having a conversation about the Tommy Robinson event with Tricia prior to our call. I shut the door because I am constantly being reprimanded for being loud and was trying to be respectful. (I would like to note that the only person who has an issue with my loudness is Marnie) Marnie proceeded to ask Matt why we were in my office with the door closed making a big deal about nothing. This is not the first occurrence. I am constantly monitored and singled out about my time in the office.

I take a shuttle to the office in the morning and it does not always run on schedule. I also have two small children that occasionally make morning departures difficult. But you can guarantee that once every two weeks Marnie calls me in her office to speak to me about my time. She claims you view her as a manager and she needs to deal with people being late. Conveniently forgotten are the late night, weekend, early morning hours spent working at home. You has always said not to be concerned about time as long as the work is being done.

I feel that Marnie targets me and has made it her mission to "reel me in" because she has said as much. Additionally, when others are being loud no one, including Marnie, ever says a word to them. As a prime example, yesterday as I was writing a letter for Lord Pearson multiple people were outside my office being incredibly loud. I said nothing, and Marnie said nothing. However, today when I was irritated about a work situation and finished my sentence as Tricia walked away, of course Marnie didn't wait two seconds to come into my office and reprimand me. I repeated these same concerns I am stating now - that she only targets me. She proceeded to march into Matt's office and tell him he "has a big mouth" and left the office slamming all the doors on the way out.

I know that I am being targeted. We have one employee who comes in late and leaves early every single day, and no one says a word. When others are loud no one says a word. There is a clear and obvious double standard and I am becoming very uncomfortable. I am held to one standard and everyone else is held to another.

We all know that this is not the first occurrence of her singling me out. I am fearful that with Marnie as the HR person my job is in jeopardy. I believe this because when after we were in your office talking about my position a few weeks ago Marnie said to me "you are lucky its not me because I would not have given that to you". She also said, that she told you, that you should "deal with my attitude before offering me any additional work". I can't work with my HR manager acting as my boss and monitoring every little thing I do. I have no recourse because my issue is with the HR manager.

Sincerely,

**Lisa Barbounis**

Executive Liaison

[Middle East Forum](#)

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409



*Please subscribe to our newsletters [here](#)!*

# **EXHIBIT 41**

## **Message from**

## **Roman to**

## **Plaintiff**

**Subject:** Re: Today  
**Date:** Tuesday, October 30, 2018 at 5:08:45 PM Eastern Daylight Time  
**From:** Gregg Roman  
**To:** Lisa Barbounis  
**CC:** Marc Fink  
**Attachments:** image013.jpg, image014.png, image014.png, image015.png, image016.png, image016.png, image017.png, image018.png

Lisa, thanks for writing to me about this issue. I'm looping in Marc, too.

We will keep all communications regarding this issue/complaint confidential and private, per our HR policies.

A few initial thoughts:

1. Please identify the employee arriving late and leaving early; that's something we would like to address immediately.
2. Our HR procedures, as written in a memo a few months ago and the personnel manual, allow for you to bypass HR if your complaint has to do with them. You did the right thing coming to me.
3. Are you available to discuss this on Friday when I'm back in, or would you like to meet tomorrow? I would like both Marc and me to have the chance to speak with you further about the issues you bring up below.

Please write back to both of us if you have any questions.

Best,

Gregg

Gregg Roman

On Oct 30, 2018, at 1:47 PM, Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)> wrote:

Gregg,

In response to what happened today I wanted to let you know what has transpired and how I am feeling.

I took this job because I was told it was flexible and there was a great culture here. What has transpired over the last year has been anything but. I am constantly monitored and micromanaged.

Today around noon I was having a conversation about the Tommy Robinson event with Tricia prior to our call. I shut the door because I am constantly being reprimanded for being loud and was trying to be respectful. (I would like to note that the only person who has an issue with my loudness is Marnie) Marnie proceeded to ask Matt why we were in my office with the door closed making a big deal about nothing. This is not the first occurrence. I am constantly monitored and singled out about my time in the office.

I take a shuttle to the office in the morning and it does not always run on schedule. I also

have two small children that occasionally make morning departures difficult. But you can guarantee that once every two weeks Marnie calls me in her office to speak to me about my time. She claims you view her as a manager and she needs to deal with people being late. Conveniently forgotten are the late night, weekend, early morning hours spent working at home. You has always said not to be concerned about time as long as the work is being done.

I feel that Marnie targets me and has made it her mission to “reel me in” because she has said as much. Additionally, when others are being loud no one, including Marnie, ever says a word to them. As a prime example, yesterday as I was writing a letter for Lord Pearson multiple people were outside my office being incredibly loud. I said nothing, and Marnie said nothing. However, today when I was irritated about a work situation and finished my sentence as Tricia walked away, of course Marnie didn’t wait two seconds to come into my office and reprimand me. I repeated these same concerns I am stating now - that she only targets me. She proceeded to march into Matt’s office and tell him he “has a big mouth” and left the office slamming all the doors on the way out.

I know that I am being targeted. We have one employee who comes in late and leaves early every single day, and no one says a word. When others are loud no one says a word. There is a clear and obvious double standard and I am becoming very uncomfortable. I am held to one standard and everyone else is held to another.

We all know that this is not the first occurrence of her singling me out. I am fearful that with Marnie as the HR person my job is in jeopardy. I believe this because when after we were in your office talking about my position a few weeks ago Marnie said to me “you are lucky its not me because I would not have given that to you”. She also said, that she told you, that you should “deal with my attitude before offering me any additional work”. I can’t work with my HR manager acting as my boss and monitoring every little thing I do.

I have no recourse because my issue is with the HR manager.

Sincerely,

**Lisa Barbounis**

Executive Liaison

Middle East Forum

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409

<image013.jpg>



<image015.png>



<image017.png> <image018.png>

Please subscribe to our newsletters [here!](#)

**EXHIBIT 42**

**Message from**

**Plaintiff to**

**Roman**

**Subject:** RE: Today  
**Date:** Tuesday, October 30, 2018 at 5:30:03 PM Eastern Daylight Time  
**From:** Lisa Barbounis  
**To:** Gregg Roman  
**CC:** Marc Fink  
**Attachments:** image001.png, image002.png

Oh and if you want to know what my exact sentence was...

I said, "in all my years working for Congress I have never experienced this. This is a shit show." I was referencing the inability of Gosar's Congressional office to comprehend the visa situation. I don't know if that is because Cliff didn't explain it well, or understand it himself, or because they just don't understand immigration and visitor visas. Either way it was super frustrating.

I am not intentionally loud. I have a voice that carries. I don't think I should be penalized for that.

---

**From:** Gregg Roman  
**Sent:** Tuesday, October 30, 2018 5:09 PM  
**To:** Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)>  
**Cc:** Marc Fink <[fink@meforum.org](mailto:fink@meforum.org)>  
**Subject:** Re: Today

Lisa, thanks for writing to me about this issue. I'm looping in Marc, too.

We will keep all communications regarding this issue/complaint confidential and private, per our HR policies. A few initial thoughts:

1. Please identify the employee arriving late and leaving early; that's something we would like to address immediately.
2. Our HR procedures, as written in a memo a few months ago and the personnel manual, allow for you to bypass HR if your complaint has to do with them. You did the right thing coming to me.
3. Are you available to discuss this on Friday when I'm back in, or would you like to meet tomorrow? I would like both Marc and me to have the chance to speak with you further about the issues you bring up below.

Please write back to both of us if you have any questions.

Best,  
Gregg

Gregg Roman

On Oct 30, 2018, at 1:47 PM, Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)> wrote:

Gregg,  
In response to what happened today I wanted to let you know what has transpired and how I am feeling.

I took this job because I was told it was flexible and there was a great culture here. What has transpired over the last year has been anything but. I am constantly monitored and micromanaged.

Today around noon I was having a conversation about the Tommy Robinson event with Tricia prior to our call. I shut the door because I am constantly being reprimanded for being loud and was trying to be respectful. (I would like to note that the only person who has an issue with my loudness is Marnie) Marnie proceeded to ask Matt why we were in my office with the door closed making a big deal about nothing. This is not the first occurrence. I am constantly monitored and singled out about my time in the office.

I take a shuttle to the office in the morning and it does not always run on schedule. I also have two small children that occasionally make morning departures difficult. But you can guarantee that once every two weeks Marnie calls me in her office to speak to me about my

time. She claims you view her as a manager and she needs to deal with people being late. Conveniently forgotten are the late night, weekend, early morning hours spent working at home. You have always said not to be concerned about time as long as the work is being done.

I feel that Marnie targets me and has made it her mission to "reel me in" because she has said as much. Additionally, when others are being loud no one, including Marnie, ever says a word to them. As a prime example, yesterday as I was writing a letter for Lord Pearson multiple people were outside my office being incredibly loud. I said nothing, and Marnie said nothing. However, today when I was irritated about a work situation and finished my sentence as Tricia walked away, of course Marnie didn't wait two seconds to come into my office and reprimand me. I repeated these same concerns I am stating now - that she only targets me. She proceeded to march into Matt's office and tell him he "has a big mouth" and left the office slamming all the doors on the way out.

I know that I am being targeted. We have one employee who comes in late and leaves early every single day, and no one says a word. When others are loud no one says a word. There is a clear and obvious double standard and I am becoming very uncomfortable. I am held to one standard and everyone else is held to another.

We all know that this is not the first occurrence of her singling me out. I am fearful that with Marnie as the HR person my job is in jeopardy. I believe this because when after we were in your office talking about my position a few weeks ago Marnie said to me "you are lucky its not me because I would not have given that to you". She also said, that she told you, that you should "deal with my attitude before offering me any additional work". I can't work with my HR manager acting as my boss and monitoring every little thing I do.

I have no recourse because my issue is with the HR manager.

Sincerely,

**Lisa Barbounis**

Executive Liaison

Middle East Forum

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409

[<image013.jpg>](#)



[<image015.png>](#)



[<image017.png>](#) [<image018.png>](#)

Please subscribe to our newsletters [here!](#)

# **EXHIBIT 43**

## **Message from O'Brien to Roman**



+1 (856) 803-8401 >

Wed, Oct 31, 12:12 PM

I'm going to text Lisa this morning to see if she wants to meet for a cup of coffee before coming into the office so that we can smooth things over otherwise it's going to be a long day

Wed, Oct 31, 5:22 PM

How'd it go

Fine. We are very alike. We just need to figure out how to respect each other. I do need yo talk to you about something though

Not now. I'm in the office I want to do my work. And not incite drama

This has me nervous especially when I'm supposed to be out of the office for two weeks and I have not submitted an official request. I'd like to send that to you today and have you approve it via email. You ok with that?

# **EXHIBIT 44**

**Message from Plaintiff to J.  
Reynolds**

From: +12159102154 Me (owner)

Pray right now.

Status: Sent

Delivered: 11/1/2018 3:27:03 PM(UTC-4)

11/1/2018 3:27:01 PM(UTC-4)

From: +12159102154 Me (owner)

Dr. Pipes just told me he put my name in the Tommy press release and Gregg said to take it out so I Don't keep focusing on the Tommy stuff

Status: Sent

Delivered: 11/1/2018 4:01:07 PM(UTC-4)

11/1/2018 4:01:05 PM(UTC-4)

From: +18562871436 Jane Reynolds

This is Dad....go for the "Me Too" approach from an "Anonymous Source". If I ever get a terminal disease I will kill him for you

Status: Read

Read: 11/1/2018 5:17:22 PM(UTC-4)

11/1/2018 5:09:43 PM(UTC-4)

From: +18562871436 Jane Reynolds

Bible study

Status: Read

Read: 11/1/2018 7:35:41 PM(UTC-4)

11/1/2018 7:22:12 PM(UTC-4)

From: +18562871436 Jane Reynolds

Still have a job

Status: Read

Read: 11/1/2018 9:04:46 PM(UTC-4)

11/1/2018 9:04:38 PM(UTC-4)

# **EXHIBIT 45**

## **Message from Plaintiff to D. Thomas**

From: +12154391002 Vasili Barbounis

Putting kids to

**Status:** Read

**Read:** 10/29/2018 8:55:35 PM(UTC-4)

10/29/2018 8:55:32 PM(UTC-4)

From: +12159102154 Me (owner)

I'm locked out

**Status:** Sent

**Delivered:** 10/29/2018 8:55:41 PM(UTC-4)

10/29/2018 8:55:41 PM(UTC-4)

From: +18562871602 David Reynolds

How's my sister

**Status:** Read

**Read:** 10/30/2018 1:21:40 PM(UTC-4)

10/30/2018 12:51:43 PM(UTC-4)

From: +12159102154 Me (owner)

I'm quitting on December 1 so we need a plan

**Status:** Sent

**Delivered:** 10/30/2018 3:19:58 PM(UTC-4)

10/30/2018 3:19:57 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Omg

**Status:** Read

**Read:** 10/30/2018 3:20:09 PM(UTC-4)

10/30/2018 3:20:09 PM(UTC-4)

From: +12159102154 Me (owner)

If I didn't have this Tommy thing I'd quit today

**Status:** Sent

**Delivered:** 10/30/2018 3:20:32 PM(UTC-4)

10/30/2018 3:20:32 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Dog food

**Status:** Read

**Read:** 10/30/2018 5:24:16 PM(UTC-4)

10/30/2018 5:08:33 PM(UTC-4)

From: +12159102154 Me (owner)

Phone broken.

**Status:** Sent

**Delivered:** 10/30/2018 6:25:10 PM(UTC-4)

10/30/2018 6:25:09 PM(UTC-4)

# **EXHIBIT 46**

## **Messages**

### **between Plaintiff and D. Thomas**

[10/30/18, 2:45:13 PM] Lisa: After his trip here I'm quitting my job and looking for another one.

[10/30/18, 2:45:28 PM] Lisa: Maybe in London Hahahaha

[10/30/18, 2:45:38 PM] Danny Thomas: What !!!!! Lisa why ??????

[10/30/18, 2:45:46 PM] Danny Thomas: Yer fuck it do it

[10/30/18, 2:45:48 PM] Lisa: I fucking hate my boss Gregg

[10/30/18, 2:45:53 PM] Lisa: Hate him.

[10/30/18, 2:46:16 PM] Lisa: It's a long story

[10/30/18, 2:51:43 PM] Danny Thomas: Jesus it's all going on, I hope your ok. Your the backbone of all this Lisa, they should of listened to you in the first place. But I know your doing all you can for Tommy, if there is anything I can do. Let me know x

---

**EXHIBIT 47**

**Deposition of**

**Marnie Meyer**

Marnie O'Brien - January 14, 2021

106

1 MS. SHIKUNOV: Hold on. Let  
2 her ask her question.

3 Q. I'm asking you if you would like  
4 me to rephrase it?

5 MS. SHIKUNOV: You can  
6 rephrase it or she can answer it. I  
7 put my form objection on the record so  
8 whatever you want to do.

9 MS. DIBIANCA: I meant the  
10 witness.

11 A. Oh, me? So when you asked me if  
12 she talked to me about it again, I  
13 thought you meant like that day in the  
14 office brought it up again. We did  
15 talk about it again and it was when she  
16 told me about what happened and that  
17 ended up with me filing a **complaint**  
18 with Daniel Pipes and Marc Fink.

19 Q. So Lisa Barbounis just -- we got  
20 a lot of pronouns on the record.

21 So when Lisa Barbounis got  
22 back from Israel she made a comment to  
23 you about, quote, the shit he pulled in  
24 Israel, quote.



WILCOX & FETZER  
(302) 655-0477 | WWW.WILFET.COM

# **EXHIBIT 48**

## **Message from Plaintiff to V. Barbounis**

From: +18562871602 David Reynolds

One nice gift let  
Person maybe

**Status:** Read

**Read:** 11/1/2018 1:31:03 PM(UTC-4)

11/1/2018 1:30:36 PM(UTC-4)

From: +12677618622 Dad

Pollyanna unless you're younger than 5

**Status:** Read

**Read:** 11/1/2018 2:08:25 PM(UTC-4)

11/1/2018 2:07:09 PM(UTC-4)

From: +12159102154 Me (owner)

Pipes just got in

**Status:** Sent

**Delivered:** 11/1/2018 3:17:22 PM(UTC-4)

11/1/2018 3:17:21 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Oh boy. Nervous for you

**Status:** Read

**Read:** 11/1/2018 3:20:03 PM(UTC-4)

11/1/2018 3:19:59 PM(UTC-4)

From: +12159102154 Me (owner)

Me too.

**Status:** Sent

**Delivered:** 11/1/2018 3:20:07 PM(UTC-4)

11/1/2018 3:20:07 PM(UTC-4)

From: +12159102154 Me (owner)

Marnie is in there

**Status:** Sent

**Delivered:** 11/1/2018 3:20:12 PM(UTC-4)

11/1/2018 3:20:11 PM(UTC-4)

From: +12154391002 Vasili Barbounis

That helps pave the way

**Status:** Read

**Read:** 11/1/2018 3:20:51 PM(UTC-4)

11/1/2018 3:20:30 PM(UTC-4)

From: +12159102154 Me (owner)

Dr. Pipes just told me he put my name in the Tommy press release and Gregg said to take it out so I Don't keep focusing on the Tommy stuff

**Status:** Sent

**Delivered:** 11/1/2018 4:00:54 PM(UTC-4)

11/1/2018 4:00:53 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Fucker

Status: Read

Read: 11/1/2018 4:01:35 PM(UTC-4)

11/1/2018 4:01:32 PM(UTC-4)

From: +12154391002 Vasili Barbounis

You are awesome and he knows it

Status: Read

Read: 11/1/2018 4:01:44 PM(UTC-4)

11/1/2018 4:01:44 PM(UTC-4)

From: +12159102154 Me (owner)

I FUCKING HATE HIM. HES A HORRIBLE PERSON

Status: Sent

Delivered: 11/1/2018 4:01:52 PM(UTC-4)

11/1/2018 4:01:51 PM(UTC-4)

From: +12154391002 Vasili Barbounis

And he is scared of you too. I know how it feels lol

Status: Read

Read: 11/1/2018 4:03:31 PM(UTC-4)

11/1/2018 4:02:10 PM(UTC-4)

From: +12154391002 Vasili Barbounis

It's sounds like he is a terrible guy. Was pipes supportive?

Status: Read

Read: 11/1/2018 4:03:31 PM(UTC-4)

11/1/2018 4:02:46 PM(UTC-4)

From: +12159102154 Me (owner)

I don't know.

Status: Sent

Delivered: 11/1/2018 4:03:37 PM(UTC-4)

11/1/2018 4:03:37 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Really?

Status: Read

Read: 11/1/2018 4:03:57 PM(UTC-4)

11/1/2018 4:03:53 PM(UTC-4)

From: +12159102154 Me (owner)

I don't know.

Status: Sent

Delivered: 11/1/2018 4:04:02 PM(UTC-4)

11/1/2018 4:04:02 PM(UTC-4)

From: +12159102154 Me (owner)

I was calm

Status: Sent

Delivered: 11/1/2018 4:04:06 PM(UTC-4)

11/1/2018 4:04:05 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Good

Status: Read

Read: 11/1/2018 4:04:51 PM(UTC-4)

11/1/2018 4:04:10 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Status: Read

Read: 11/1/2018 4:04:58 PM(UTC-4)

11/1/2018 4:04:58 PM(UTC-4)

From: +12159102154 Me (owner)

I got teary eyed when I said I love working here

Status: Sent

Delivered: 11/1/2018 4:05:14 PM(UTC-4)

11/1/2018 4:05:14 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Good

Status: Read

Read: 11/1/2018 4:05:24 PM(UTC-4)

11/1/2018 4:05:23 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Want me to pick you up?

Status: Read

Read: 11/1/2018 4:35:33 PM(UTC-4)

11/1/2018 4:35:23 PM(UTC-4)

From: +12159102154 Me (owner)

No. Go get the kids

Status: Sent

Delivered: 11/1/2018 4:35:41 PM(UTC-4)

11/1/2018 4:35:40 PM(UTC-4)

From: +12159102154 Me (owner)

I'm devastated

Status: Sent

Delivered: 11/1/2018 4:35:46 PM(UTC-4)

11/1/2018 4:35:46 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Why what else happened?

Status: Read

Read: 11/1/2018 4:36:08 PM(UTC-4)

11/1/2018 4:36:08 PM(UTC-4)

From: +12159102154 Me (owner)

He's going to reprimand Gregg and we all stay and work for him

**Status:** Sent

**Delivered:** 11/1/2018 4:36:40 PM(UTC-4)

11/1/2018 4:36:40 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Figured

**Status:** Read

**Read:** 11/1/2018 4:37:06 PM(UTC-4)

11/1/2018 4:37:04 PM(UTC-4)

From: +12154391002 Vasili Barbounis

I have my joint card and i have no gas

**Status:** Read

**Read:** 11/1/2018 4:59:57 PM(UTC-4)

11/1/2018 4:51:52 PM(UTC-4)

From: +12154391002 Vasili Barbounis

You have

**Status:** Read

**Read:** 11/1/2018 4:59:57 PM(UTC-4)

11/1/2018 4:51:59 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Need \$50 in joint and i will replace

**Status:** Read

**Read:** 11/1/2018 4:59:57 PM(UTC-4)

11/1/2018 4:52:38 PM(UTC-4)

From: +12159102154 Me (owner)

In

**Status:** Sent

**Delivered:** 11/1/2018 5:00:45 PM(UTC-4)

11/1/2018 5:00:44 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Need funds ASAP

**Status:** Read

**Read:** 11/1/2018 5:16:39 PM(UTC-4)

11/1/2018 5:07:50 PM(UTC-4)

From: +12159102154 Me (owner)

I put them in

**Status:** Sent

**Delivered:** 11/1/2018 5:16:44 PM(UTC-4)

11/1/2018 5:16:43 PM(UTC-4)

From: +12154391002 Vasili Barbounis

You taking some time to yourself?

**Status:** Read

**Read:** 11/1/2018 6:34:30 PM(UTC-4)

11/1/2018 6:29:13 PM(UTC-4)

From: +12159102154 Me (owner)

Yes. I'll be home. I might have a great plan

**Status:** Sent

**Delivered:** 11/1/2018 6:34:53 PM(UTC-4)

11/1/2018 6:34:52 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Oh yeah?

**Status:** Read

**Read:** 11/1/2018 6:35:17 PM(UTC-4)

11/1/2018 6:35:17 PM(UTC-4)

From: +12159102154 Me (owner)

Yes. I'm very sad but am planning.

**Status:** Sent

**Delivered:** 11/1/2018 6:35:47 PM(UTC-4)

11/1/2018 6:35:47 PM(UTC-4)

From: +12154391002 Vasili Barbounis

We are in the park w boog

**Status:** Read

**Read:** 11/1/2018 6:54:55 PM(UTC-4)

11/1/2018 6:48:12 PM(UTC-4)

From: +12159102154 Me (owner)

I walked home on most there I'm at Fairmount Avenue

**Status:** Sent

**Delivered:** 11/1/2018 7:48:16 PM(UTC-4)

11/1/2018 7:48:16 PM(UTC-4)

From: +12159102154 Me (owner)

**Attachments:**



Size: 1373678  
File name: IMG\_5219.HEIC  
IMG\_5219.HEIC

**Status:** Sent

**Delivered:** 11/2/2018 12:56:12 PM(UTC-4)

11/2/2018 12:56:10 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Seriously

**Status:** Read

**Read:** 11/2/2018 12:57:21 PM(UTC-4)

11/2/2018 12:57:02 PM(UTC-4)

From: +12159102154 Me (owner)

After the kids go to bed can I go out with Tricia?

**Status:** Sent

**Delivered:** 11/2/2018 6:53:59 PM(UTC-4)

11/2/2018 6:53:59 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Yes, our team picture took forever!

**Status:** Read

**Read:** 11/2/2018 7:09:44 PM(UTC-4)

11/2/2018 6:58:56 PM(UTC-4)

From: +12159102154 Me (owner)

No worries

**Status:** Sent

**Delivered:** 11/2/2018 7:09:50 PM(UTC-4)

11/2/2018 7:09:49 PM(UTC-4)

From: +12159102154 Me (owner)

All good here

**Status:** Sent

**Delivered:** 11/2/2018 7:09:53 PM(UTC-4)

11/2/2018 7:09:52 PM(UTC-4)

From: +12159102154 Me (owner)

No rush for me

**Status:** Sent

**Delivered:** 11/2/2018 7:10:02 PM(UTC-4)

11/2/2018 7:10:02 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Ok good

**Status:** Read

**Read:** 11/2/2018 7:10:05 PM(UTC-4)

11/2/2018 7:10:04 PM(UTC-4)

From: +12159102154 Me (owner)

Do you know what time you will be home? No rush just trying to figure out Jolie

**Status:** Sent

**Delivered:** 11/2/2018 7:17:01 PM(UTC-4)

11/2/2018 7:17:01 PM(UTC-4)

From: +12154391002 Vasili Barbounis

At Logan circle

**Status:** Read

**Read:** 11/2/2018 7:25:28 PM(UTC-4)

11/2/2018 7:17:30 PM(UTC-4)

From: +12159102154 Me (owner)

You out?

Status: Sent

Delivered: 11/2/2018 11:30:57 PM(UTC-4)

11/2/2018 11:30:57 PM(UTC-4)

From: +18562871602 David Reynolds

No in bed already

Status: Read

Read: 11/2/2018 11:36:16 PM(UTC-4)

11/2/2018 11:34:05 PM(UTC-4)

From: +18562871602 David Reynolds

You having fun

Status: Read

Read: 11/2/2018 11:36:16 PM(UTC-4)

11/2/2018 11:34:11 PM(UTC-4)

From: +12159102154 Me (owner)

Ya. Drinkers

Status: Sent

Delivered: 11/2/2018 11:36:24 PM(UTC-4)

11/2/2018 11:36:24 PM(UTC-4)

From: +12159102154 Me (owner)

I'm out with Tricia

Status: Sent

Delivered: 11/2/2018 11:37:09 PM(UTC-4)

11/2/2018 11:37:09 PM(UTC-4)

From: +18562871602 David Reynolds

Nice ! Tear it up.

Status: Read

Read: 11/2/2018 11:45:17 PM(UTC-4)

11/2/2018 11:37:25 PM(UTC-4)

From: +18562871602 David Reynolds

I'm laying in bed looking at my phone. Resting my foot

Status: Read

Read: 11/2/2018 11:45:17 PM(UTC-4)

11/2/2018 11:37:36 PM(UTC-4)

From: +12159102154 Me (owner)

You poor thing

Status: Sent

Delivered: 11/2/2018 11:45:27 PM(UTC-4)

11/2/2018 11:45:27 PM(UTC-4)

From: +12159102154 Me (owner)

I can't believe you actually think like that. I really can't. I can't see how you think that is a rational/reasonable position.

Status: Sent

Delivered: 11/3/2018 1:52:58 PM(UTC-4)

11/3/2018 1:52:56 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Dick I'm sorry I was just being a dick because I feel overwhelmed by the house and I want to get some work done

Status: Read

Read: 11/3/2018 1:57:21 PM(UTC-4)

11/3/2018 1:57:15 PM(UTC-4)

From: +12154391002 Vasili Barbounis

Too

Status: Read

Read: 11/3/2018 1:57:21 PM(UTC-4)

11/3/2018 1:57:18 PM(UTC-4)

From: +12154391002 Vasili Barbounis

I'm sorry i was being a dick frickin Siri

Status: Read

Read: 11/3/2018 1:57:55 PM(UTC-4)

11/3/2018 1:57:55 PM(UTC-4)

From: +12154391002 Vasili Barbounis

I'm going Wawa want anything?

Status: Read

Read: 11/3/2018 1:58:27 PM(UTC-4)

11/3/2018 1:58:27 PM(UTC-4)

From: +12159102154 Me (owner)

ya but you blame it on me not taking care of you. Not doing small gestures. Like when does anyone do small anything for me. I'm busting my ass treading water to keep up alive. I did the tax stuff

Status: Sent

Delivered: 11/3/2018 1:58:33 PM(UTC-4)

11/3/2018 1:58:32 PM(UTC-4)

From: +12159102154 Me (owner)

I did the kids school stuff

Status: Sent

Delivered: 11/3/2018 1:58:39 PM(UTC-4)

11/3/2018 1:58:39 PM(UTC-4)

From: +12159102154 Me (owner)

I have a job and school

Status: Sent

Delivered: 11/3/2018 1:58:44 PM(UTC-4)

11/3/2018 1:58:44 PM(UTC-4)

# **EXHIBIT 49**

# **Email from D.**

# **Pipes**

---

**From:** Daniel Pipes  
**Sent:** Friday, November 2, 2018 7:51 PM  
**To:** Gregg Roman  
**Cc:** Marc Fink  
**Subject:** Allegations and conclusions

Dear Gregg:

As you know, there have been several allegations of improper conduct directed against you. The Middle East Forum takes these allegations very seriously. Accordingly, I investigated this matter yesterday, immediately upon learning of it.

Here is what I found: Three women who work for you – Lisa, Tricia and Marnie – say that you made unwanted sexual advances toward them. You maintain that you never made such advances and did not know they felt uncomfortable. But you acknowledge that your conduct, whatever your intentions were, was not acceptable and put these employees in a difficult position.

You put this in the context of calling yourself a “social junkie” who seeks constant social interaction. You acknowledge this drive led to melding together your business and personal relationships with staffers, male and female alike. You acknowledge that this melding must cease immediately and that you will limit yourself, within reason, to professional relations with MEF staff, fellows, and interns.

In light of the forgoing and considering the stated wishes of these three staffers to go on with their work at MEF, I propose a new structure governing the employment relationship between you and female staffers: no contact outside of business hours other than using MEF e-mail. That means no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth. And even during business hours, interactions will be business-related, within reason.

Furthermore, you agree that there will be no retaliation against these three employees whatsoever, now or in the future, for them informing me of this matter; while they agree immediately to inform me directly in the future about any problems concerning you.

You acknowledge that if there is a future case of a credible unwanted sexual advance by you toward a female staffer under your supervision, you will be fired immediately.

Finally, I ask you to respond to this question:

Do you agree to my proposed new structure governing the employment relationship between you and female staffers? If not, please propose additional/alternative structures.

I'd appreciate a quick reply that you accept these terms, as we are trying to close this matter as soon as possible. Thank you for your cooperation.

Yours sincerely,

Daniel Pipes

cc: Marc Fink

# **EXHIBIT 50**

## **Memo from D.**

# **Pipes to Roman**

---

November 6, 2018

Dear Gregg:

Effective Nov. 5, your job description has changed. In particular, you are no longer running the administration of the Middle East Forum.

Pursuant to our phone conversion on that date, I formally offer you new, interim terms for your employment. (Interim because the office and I are reeling from the sudden changes this month and need to preserve the right to make changes.)

Title

You keep the title of director.

Responsibilities

You will have the following responsibilities:

- Managing the Forum's external projects and initiatives, including all the directors of the Forum's formal projects except the *Middle East Quarterly* editor.
- Fundraising, in meetings, on the telephone, and in writing.
- Making media appearances on Forum-related topics.

Restrictions

You will have the following restrictions until further notice:

- No involvement in the Forum's accounting, finances, office affairs, personnel issues, and property management.
- No authority over the Forum's administrative staff.
- No authority to approve expenses of projects or initiatives.
- No authority to hire or fire Forum employees, including project directors.
- No authority to offer or approve contracts on behalf of the Forum.
- No authority over Middle East Forum Education Fund monies.
- No access to the Forum's Philadelphia office.
- No contact with the Forum's female employees outside of business hours other than using Forum e-mail. That means no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth. And during business hours, interactions will be business-related, within reason.

Conditions

As a condition precedent for this new, interim offer of employment, you shall turn over to designated staffers your administrative control over the following platforms:

- Asana (Marnie Meyer)
- Slack (Marnie Meyer)
- Dropbox (Marnie Meyer)
- Zenefits (Marnie Meyer)
- Salesforce (Matt Bennett)
- Contactually (Matt Bennett)

- Twitter (Lisa Barbounis)
- YouTube (Lisa Barbounis)
- Facebook (Lisa Barbounis)
- LexisNexis (Marc Fink)

In case other platforms have been omitted, the Forum reserves the right to add those to this list.

#### Salary

Your salary and benefits remain unchanged. Your salary will be payable in accordance with the Forum's standard payroll practice and subject to applicable withholding taxes. Because your position is exempt from overtime pay, your salary will compensate you for all hours worked.

#### Expenses

You agree not to incur any liabilities with third parties and only to expend your own resources with the expectation of reimbursement by the Forum when specifically pre-approved by me in writing, on a case by case basis. If the expense is approved by me, you shall lay out the funds, then submit a reimbursement form to the Forum's controller.

#### Travel

You will continue to travel on MEF business, according to the procedures specified under Expenses, above. When traveling, you must keep in mind that you are working for a non-profit that legally and morally must spend money thrifitly. That means economy class on trains and planes, standard business rooms in hotel, and ordinary rideshare and rental cars. In particular, when possible, air travel must be booked weeks in advance to get advantageous prices.

#### Other terms

You will be an employee-at-will, meaning that either you or the Forum may terminate our relationship at any time for any reason, with or without cause. Any statements to the contrary that may have been made to you, or that may be made to you, by the Forum, its agents, or representatives, are superseded by this offer letter. To re-emphasize, these interim terms are subject to change.

You shall work remotely, from anywhere of your choosing.

You are eligible to participate in the following benefit plans:

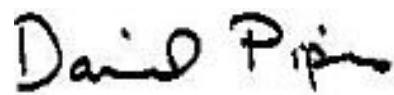
- Group medical health, which may include dental and vision coverage depending on the plan you choose.
- 403(b) retirement plan.
- Life insurance.
- Short-term and long-term disability.

(Please note: participation in these benefits may *reduce* the amount of your all-inclusive salary.)

If you wish to accept employment with the Forum under these terms, please indicate so by signing two copies of this letter, returning one copy to me. You may do so by regular mail or by scanning this letter and e-mailing it.

This offer and all terms of employment stated in this letter will expire at 5:00 PM Eastern Standard Time on Friday, November 9, 2018.

Sincerely,



Daniel Pipes  
President, Middle East Forum

With the signature below, I accept employment with the Middle East Forum, under the terms set forth in this letter.

---

Gregg Roman

---

Date

# EXHIBIT 51

## Email from D. Pipes

## Pipes Letter to Meyer RE: Roman – 11/4/2018

---

**From:** Daniel Pipes

**Sent:** Sunday, November 4, 2018 11:34 AM

**To:** Marnie Meyer

**Cc:** Marc Fink

**Subject:** Allegations and consequences

Dear Marnie:

I am responding to the allegations you raised on Nov. 1 of improper conduct by Gregg. The Middle East Forum takes these allegations very seriously.

I have investigated this matter and found the following: You say that Gregg made unwanted sexual advances toward you. Gregg maintains that he never made such advances.

But, on learning your reaction, he acknowledges that his conduct was unacceptable and put you in a difficult position. Gregg put this in the context of calling himself a “social junkie” who seeks constant social interaction. He acknowledges this drive led to melding together his business and personal relationships with staffers, male and female alike; he also acknowledges that this mixing of business and personal relations must cease immediately.

In light of the forgoing and considering your stated wish to go on with your work at MEF, I propose several changes:

1. Gregg is no longer your supervisor; if he were to become that again in the future, it would only be with your consent.
2. During business hours, you both agree to limit yourselves, within reason, to professional relations.
3. Outside of business hours, you both agree to no contact other than using MEF e-mail: that is, no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth.

Gregg agrees that there will be no retaliation against you whatsoever, now or in the future, for you informing me of this matter. You agree not to wait months to inform me about any problems in the future concerning Gregg, but to do so immediately.

Gregg has been told and accepts that if there is a future case of a credible unwanted sexual advance by him toward a female staffer under his supervision, he will be fired immediately.

In the interests of documenting precisely what happened, I request that you send me a written account of what you already told me about Gregg’s unwanted advances toward you.

Finally, I ask you to respond to three questions:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

Thank you for bringing this matter to my attention, and for your cooperation.

Yours sincerely,

Daniel Pipes

## Pipes Letter to Barbounis RE: Roman – 11/4/2018

---

**From:** Daniel Pipes  
**Sent:** Sunday, November 4, 2018 11:34 AM  
**To:** Lisa Barbounis  
**Cc:** Marc Fink  
**Subject:** Allegations and consequences

Dear Lisa:

I am responding to the allegations you raised on Nov. 1 of improper conduct by Gregg. The Middle East Forum takes these allegations very seriously.

I have investigated this matter and found the following: You say that Gregg made unwanted sexual advances toward you. Gregg maintains that he never made such advances.

But, on learning your reaction, he acknowledges that his conduct was unacceptable and put you in a difficult position. Gregg put this in the context of calling himself a “social junkie” who seeks constant social interaction. He acknowledges this drive led to melding together his business and personal relationships with staffers, male and female alike; he also acknowledges that this mixing of business and personal relations must cease immediately.

In light of the forgoing and considering your stated wish to go on with your work at MEF, I propose several changes:

1. Gregg is no longer your supervisor; if he were to become that again in the future, it would only be with your consent.
2. During business hours, you both agree to limit yourselves, within reason, to professional relations.
3. Outside of business hours, you both agree to no contact other than using MEF e-mail: that is, no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth.

Gregg agrees that there will be no retaliation against you whatsoever, now or in the future, for you informing me of this matter. You agree not to wait months to inform me about any problems in the future concerning Gregg, but to do so immediately.

Gregg has been told and accepts that if there is a future case of a credible unwanted sexual advance by him toward a female staffer under his supervision, he will be fired immediately.

In the interests of documenting precisely what happened, I request that you send me a written account of what you already told me about Gregg’s unwanted advances toward you.

Finally, I ask you to respond to three questions:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

Thank you for bringing this matter to my attention, and for your cooperation.

Yours sincerely,

Daniel Pipes

## Pipes Letter to McNulty RE: Roman – 11/4/2018

---

**From:** Daniel Pipes  
**Sent:** Sunday, November 4, 2018 11:34 AM  
**To:** Tricia McNulty  
**Cc:** Marc Fink  
**Subject:** Allegations and consequences

Dear Tricia:

I am responding to the allegations you raised on Nov. 1 of improper conduct by Gregg. The Middle East Forum takes these allegations very seriously.

I have investigated this matter and found the following: You say that Gregg made unwanted sexual advances toward you. Gregg maintains that he never made such advances.

But, on learning your reaction, he acknowledges that his conduct was unacceptable and put you in a difficult position. Gregg put this in the context of calling himself a “social junkie” who seeks constant social interaction. He acknowledges this drive led to melding together his business and personal relationships with staffers, male and female alike; he also acknowledges that this mixing of business and personal relations must cease immediately.

In light of the forgoing and considering your stated wish to go on with your work at MEF, I propose several changes:

1. Gregg is no longer your supervisor; if he were to become that again in the future, it would only be with your consent.
2. During business hours, you both agree to limit yourselves, within reason, to professional relations.
3. Outside of business hours, you both agree to no contact other than using MEF e-mail: that is, no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth.

Gregg agrees that there will be no retaliation against you whatsoever, now or in the future, for you informing me of this matter. You agree not to wait months to inform me about any problems in the future concerning Gregg, but to do so immediately.

Gregg has been told and accepts that if there is a future case of a credible unwanted sexual advance by him toward a female staffer under his supervision, he will be fired immediately.

In the interests of documenting precisely what happened, I request that you send me a written account of what you already told me about Gregg’s unwanted advances toward you.

Finally, I ask you to respond to three questions:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

Thank you for bringing this matter to my attention, and for your cooperation.

Yours sincerely,

Daniel Pipes

## Meyer Response to Pipes RE: Roman 11-04-18

---

On 2018-11-04, 3:13 PM, "Marnie Meyer" <[marniem03@gmail.com](mailto:marniem03@gmail.com)> wrote:

Dear Daniel:

Thank you for your email. I am replying only to you because I do not think Gregg has the ability to access your email. I'm not confident that he cannot access Marc's. He had Hybros change everyone's passwords with the exception of yours and he asked that they not be changed and he had me send all of them to him. I would prefer that you share this with Marc through his personal email or confirm that he has changed his hybros issued password prior to sending it to him.

My responses to your questions are as follows"

1. Do you agree to my proposed three changes? If not, please specify. **I am in agreement with all three changes, but I will require some added changes. I would like my computer, email, and access to all banking/financial platforms changed and the assurance that Gregg will not have the ability to acquire any of my passwords and sign in under the same log on as me. I am fine with sharing those passwords with you and Marc or anyone you deem trustworthy, but I do not want to have shared access with him for any financial platform. I want assurances that he cannot change my work product nor will he have access to the ability to create any transactions under a shared log on so that it may seem as if I created them. I do not want him to have the ability to access my office if I am not there. I'm happy for you and Marc or anyone you trust to have that ability. If he is to retain the power of approving all MEF expenditures, I would like to request a second level of approvals by anyone you deem fit to handle that responsibility. There may be other things that I think of, but I want to protect myself from any ability he may have to spend MEF funds and make it look as if I have done it and for him to tamper with my work product.**
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request? **At this point, I am satisfied that MEF is taking steps to protect the interest of its employees. I cannot say at this time that feel the matter has been handled only because I do not know the exact changes you are instituting nor do I know how these changes will affect my ability to perform my day to day duties. I do feel optimistic that you are attempting to handle the matter appropriately.**
3. Do you consider this matter satisfactorily resolved? **Again, I do not really know the exact resolution at this time but I do know that the full resolution would provide me the ability to perform my duties free from worry that anyone could tamper with my work product or make it look as if I've misappropriated or stolen funds. As it is, there**

**is no payment or paycheck that goes out the door that Gregg does not approve. He also has the ability to create transactions under the same log-on profiles that I use. He has access to a spreadsheet that I keep with every password on it. I will not feel comfortable if he continues with that authority nor do I feel it's in the forum's best interest for him to retain that power.**

## Pipes Response to Meyer Response RE: Roman – 11-4-18

---

From: **Daniel Pipes** <daniel.pipes@gmail.com>  
Date: Sun, Nov 4, 2018 at 4:17 PM  
Subject: Re: Allegations and consequences  
To: Marnie Meyer <marniem03@gmail.com>  
Cc: Marc Fink <marcfink.mef@gmail.com>

Dear Marnie,

Thank you for your quick response and thoughts. As you requested, I forwarded your note to Marc's personal e-mail. Given that you are both on Gmail, I have joined you on it.

The issue of expenditures is an important one for us to investigate, and you are invited to bring it up tomorrow. The steps you propose make good sense. I will be in further contact with you on this issue.

But I'd like to return to the sexual harassment issue prompted by your 5-page note to me on Thursday. On this issue alone, could you answer the three questions I posed:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

If you can send this from MEForum.org to MEForum.org, that would be best but sending to the private e-mails is fine too.

All best, Daniel

## Meyer Response to Pipes Response to Meyer RE: Roman 11-4-18

---

From: **Marnie Meyer** <marniem03@gmail.com>  
Date: Sun, Nov 4, 2018 at 7:30 PM  
Subject: Re: Allegations and consequences  
To: Daniel Pipes <daniel.pipes@gmail.com>  
Cc: <marcfink.mef@gmail.com>

Dear Daniel,

I prefer to stick to personal emails. I do not want Gregg to see anything that I'm writing and if he has not had his access blocked I know that he can and that he will be looking for any information he can find. My response to the three questions in regard to the sexual harassment issues are as follows:

1. Do you agree to my proposed three changes? If not, please specify.-**I agree to all three of those changes, but I will need more changes instituted in order to feel completely comfortable working with Gregg in the future.** I would like to be clear in the third change that you stated that I have already removed Gregg from all of my social media. I have no desire to have contact with him during the work day let alone after hours. I did not feel after hour work meetings, outings or shared lodging were necessary prior to this. I feel he was facilitating and using those situations with the intention of taking advantage female staff members. I am happy to see all of that come to an end.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request? **I am satisfied that the Forum is attempting to successfully handle this matter.** In order to feel satisfied that the matter has been handled, I will need details on the exact expectation of how I am to fulfill my duties. Currently, all of my work is directed and approved by Gregg. My preference would be that my duties no longer intersect with his. I would prefer not to work in the same office with him. I am capable of being professional if there is a need for some type of professional interaction needed, but I don't believe a team can operate successfully without trust and at this point I have zero trust for Gregg Roman as an individual and as a leader.
3. Do you consider this matter satisfactorily resolved? **I do not feel I've had a full resolution laid out for me.** I do feel confident that the Forum is working towards satisfactorily resolving this matter and I intend to work with you towards that end.

I will work on a detailed report of my experience. I will have it to you within a couple days. I want to take my time and write it up accurately.

## McNulty Letter to Pipes RE: Roman 11-4-18

---

**From:** Tricia McNulty  
**Sent:** Sunday, November 4, 2018 5:43 PM  
**To:** Daniel Pipes  
**Cc:** Marc Fink  
**Subject:** Re: Allegations and consequences

Dear Daniel,

On November 1st, I confirmed with you that I was aware of certain indiscretions between Lisa Barbounis and Gregg Roman during a trip to Israel in May. While the two were in Israel, Lisa and I had a conversation via text and call where she expressed Gregg was inappropriate towards her and had also informed her of his previous indiscretions with MEF intern, Lea Merville. She mentioned being very scared and uncomfortable, to the extent that she had hid a knife under her pillow.

When she mentioned Gregg was "being weird", "had drank too much", and "was making her feel uncomfortable", I asked her if that meant he was getting "AIPAC couch-ish". My reference was to the night after our MEF dinner at AIPAC. Following the dinner we attended another AIPAC event where guests were drinking before going to a bar. After the bar, MEF staff and a few other AIPAC attendees went back to an air b&b where Gregg was staying. In the living room, Gregg was sitting on the couch in between Lisa and myself. Matt Bennett, Marnie Meyer, Raheem Kassam, and three other men, who I do not know, were all in the room discussing work and possible collaborations. After about fifteen minutes, Gregg abruptly asked the three men to leave the room. At that point, as the men were trying to wrap up their conversation with Matt, Gregg put his arm around Lisa and myself and pulled me into him so that I was almost in his lap and began whispering in my ear that no other men should be in the room. At that point I pulled away and left the couch.

I do apologize that I did not tell you sooner of the incident, but I felt that I could handle myself in that capacity and thought that I was doing the right thing for the organization. I felt compelled to disclose this incident to you because I knew there were saved text messages which referenced it, that would be pertinent to issues being discussed and might be shown, and felt I needed to be forthright with that information. I am extremely sorry that you were not informed of these issues right away, but please know that until they were forced to the surface I did feel like I was doing the best thing for the organization by keeping them private. I felt like I was being loyal to MEF because I thought it did not affect anyone but myself. I do promise that any future incidents, should they happen, will be reported to you immediately.

In response to the three questions you posed:

1. I do have reservations working in the same space with Gregg after everything that has transpired. More so because I have witnessed his vindictive, manipulative, and volatile nature than I worry of sexual advances. I very much enjoy working for MEF and want nothing more than to continue to do so. I am so proud to be even a small part of your life's work and believe so strongly in the mission. I do agree to the three changes you proposed in your email, but would ask that an additional change be considered:
  - o If it is found that working in the same office space as Gregg becomes unendurable after what has transpired, the option to work remotely be considered.
2. With the above consideration I am satisfied with how the Forum has handled this matter.
3. With the above consideration I consider this matter satisfactorily resolved.

I am very sorry that all of this took place and for the position it has put you in as well. I want nothing more than to move on and continue working hard for MEF.

Sincerely,

**Tricia McNulty**  
Program Manager  
Middle East Forum  
Phone: (215) 546-5406 ext. 110  
Email:[McNulty@MEForum.org](mailto:McNulty@MEForum.org)  
Fax: (215) 546-5409  
[www.MEForum.org](http://www.MEForum.org)

## Barbounis Letter to Pipes Letter RE: Roman 11-4-18

---

**From:** Lisa Barbounis  
**Sent:** Sunday, November 4, 2018 6:48 PM  
**To:** Daniel Pipes  
**Cc:** Marc Fink  
**Subject:** Re: Allegations and consequences

Dear Dr. Pipes,

Thank you for taking the time to address my concerns quickly and professionally. I have read your email and would like to address your comments and questions.

Gregg's "social junkie" as a function of his personality explanation is an inexcusable defense. Gregg made unwanted sexual advances and put me in an uncomfortable situation. However, I felt at the time I handled the issue and have not had an incident since. Nevertheless, his "inappropriate behavior" is the least of my concern. More troubling is the deceit and abusive behavior I witness and experience on a weekly basis which increased after the Israel incident.

I sat in Gregg's office as he was preparing to confront one of his many adversaries. He said to me, "if you cross me, I will slit your throat." I took this figuratively but have since watched as anyone, that so much as challenged him, has been met with calculated, spiteful and malicious, concealed action. I have watched as Gregg patiently maneuvered to have Garry, Cliff, EJ, Marc, etc. each receive derogatory marks on their records or reputation in order to make his move to have them eventually disassociate with MEF. I listened to him lie to both you and Marc about his interaction with Arthur Stein. I have listened to him divulge private details of your (Dr. Pipes') personal affairs. I have watched him speak poorly and unfairly about MEF employees to other employees to sow seeds of doubt and create conflict. I have no doubt that if Gregg were to remain, he would employ the same strategy toward me. As a matter of fact, he has already begun. He has even broken confidentiality protocol by offering Marnie the ability to read the incident report he instructed Matt to have me write. In order to maintain a cohesive working relationship, there needs to be at least a minuscule element of trust. Plainly, I do not trust Gregg Roman with anything. Gregg has even gone as far as claiming he believes MEF is better without you, Daniel Pipes. In an ordinary conversation I asked Gregg, "what do you think MEF has to do to reach the next level, like CATO or Heritage?" His response was, "disassociate from Daniel." If he is not loyal to you what would ever make me believe he would be concerned with my best interest?

In addition to his retaliatory nature, as Thelma once said, "Gregg only operates in a state of chaos." It is because of this chaos that this past year has been borderline unbearable. If the absurd requests, mismanagement, outrageous expectations and demands weren't enough, the abusive tone, language, never-ending lies and manipulation have the **entire office** in a constant state of disarray. Stacey has been in tears more than once slamming things on her desk. Thelma was talking about quitting over the way Gregg spoke to her. Poor Delaney is constantly in my office because she is so afraid to submit anything to Gregg without my prior review. He overworks every employee, doesn't give clear instructions, creates near impossible and unrealistic deadlines, defers his managerial duties to his employees, purposefully holds employees back from being successful and then annihilates anyone who doesn't produce the exact same outcome as the one created in his head. Not one single person in that office, and few employees outside the office, think we function in a healthy work environment.

It is because of these concerns listed above that I do not believe Gregg's presence in the office is beneficial to MEF as a whole. I would be happy to elaborate on any of the aforementioned instances.

To address your questions directly:

1. Do you agree to my proposed three changes? If not, please specify.
  - a. I agree that Gregg will no longer be my supervisor and we will have no outside communication. However, much of my work is directly related to Gregg and his affairs. I do not understand how this will be possible unless there is a change in my duties.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
  - a. I am satisfied with the speed of inquiry yet disappointed in the discovery aspect of the incident. I will, as requested, submit a separate detailed description of the events that occurred on March 14 in addition to all corroborating evidence.
  - b. I believe it would be valuable for you or Marc to speak to every office employee regarding Gregg's behavior and the office environment.
  - c. As stated above, I do not believe it will be beneficial to have Gregg operate out of the central office. There is no scenario where I believe his presence will have a positive outcome.
3. Do you consider this matter satisfactorily resolved?
  - a. I am currently unable to answer this because I am unaware of the final details of the proposed resolution.

As I have stated before, I wholeheartedly believe in the good work of the Middle East Forum and wish to remain a faithful employee of the organization. As such, I vow to come to you with any issues immediately. I would like to note, I unequivocally believe that future turmoil of this nature is unavoidable should Gregg Roman remain an integral part of the MEF operation.

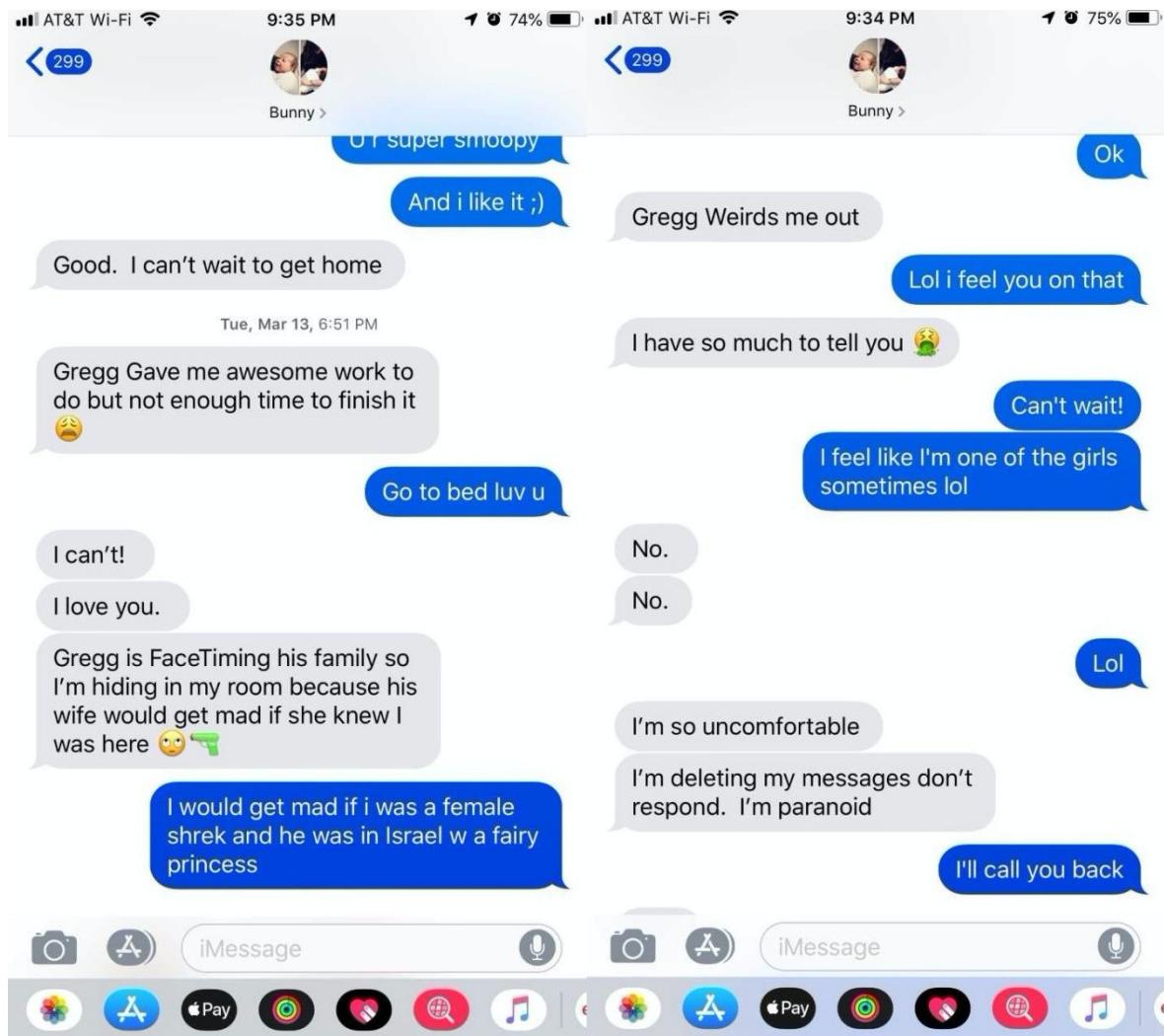
I thank you for taking my concerns and allegations seriously.

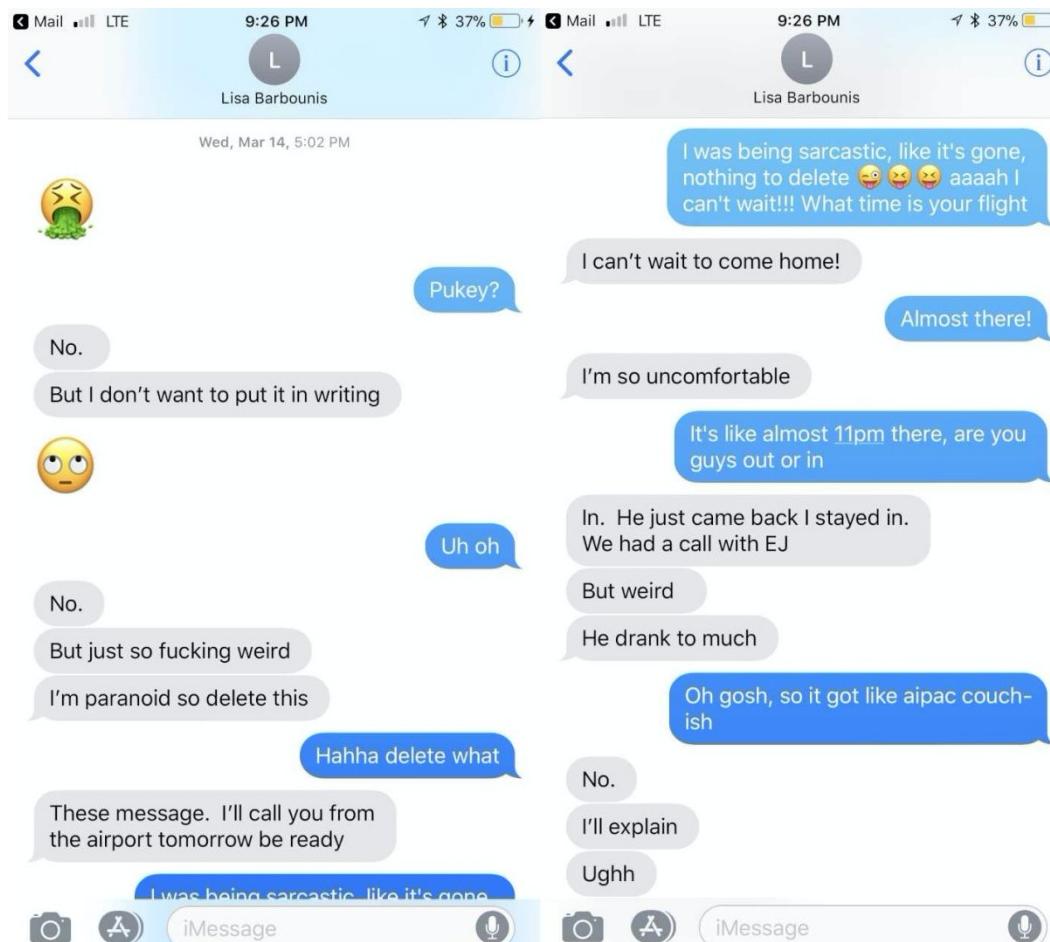
Sincerely,

Lisa Barbounis

\*Attached you will find screenshots from my March 14 conversations with both my husband and Tricia regarding Gregg's behavior in addition to screen shots directly from Gregg referencing you (Dr. Pipes) during the Hoberman Snowball proposal phone call.

I believe I may have more you want to see should I keep looking.







# **EXHIBIT 52**

# **Meeting Notes**

Meeting on Gregg Roman November 5, 2018:

DP explained GR would not be joining

MF said this meeting was confidential

DP said he was disappointed in everyone as his motto is "No Surprises" then asked what exactly was going on

Main topics discussed:

- MM and LB and MB fights – said GR was manipulative and MM said he told LB to write up the incident, then told her that LB wrote it up, then offered to let her see a screen shot of what LB wrote. Said she felt manipulated because GR said he had her back and after talking to LB realized that they were being pitted against each other
- Israel trip
  - o LB said she didn't understand why it was a big secret, that GR asked her not to be in sight when facetimeing with his wife, and that no MEF employee should know she was there
  - o MB said he had put it on the MEF calendar but it was gone the next day
  - o MM said she knew about it but didn't know why she needed to keep it a secret from DP
  - o LB said she went on a trip to Israel with GR and was asked not to tell anyone in the company she went. Said she didn't see anything wrong with it at first since it was for a secret project until GR asked her to hide while facetimeing with his wife. Mentioned inappropriate behavior happened in DC, GR smoked pot in front of other people.
  - o SR said for clarification was that the night the 3 girls were laughing about wearing short skirts and being drunk?
  - o MM responded with no that was New York. TM said they were all dressed very modestly then.
- Were people afraid of GR
  - o Said he was a large man with a temper
  - o LB said DY brought in pepper spray because she was afraid of GR today. DY clarified it was still in its packaging
  - o LB said DY was always in her office because she was going over what she had to send to GR first since she was afraid
  - o SR said she was more afraid of LB with her emotional breakdowns and loud outbursts
  - o MM said she had seen SR cry, TM chimed in. SR clarified it was not over GR, but that TM had made a mistake and SR was blamed for it and did not think it was right that TM did not take responsibility
- Financial misuse of funds
  - o Business class seats
  - o Contractually (paid for by MEF, but employees instructed not to use it)
- People feeling like they were being watched
  - o SR explained that it is most companies policies to monitor what sites their employees visit and that they probably felt watched because there was a video feed of the entry way, visibly on display to everyone

- They mentioned GR called to check in who was there and what they were working on
- An example was of LB when she was on the phone too long. SR mentioned perhaps it was because of her history of taking personal phone calls throughout the day and her emotional bouts of crying in her office.
- Technology
  - Venders were discussed as to the effectiveness
  - Splash point discussed – SR explained that screen viewing did not mean that passwords were recorded, that was a different program that no one in this office would have access to and that any syncing of personal wifi enabled devices was due to a gmail sync, not the company
- Arthur Stein
  - MB said he didn't know why GR said not to talk to him any more
  - LB said he was a sweet old man and that GR just must not have liked the project. That GR would ridicule Mr. Stein and be rude and Mr. Stein would write to her asking why GR was so mean
- Speaking ill of DP
  - LB said she sent DP a screenshot of GR cursing about him and calling him names
  - MB said GR asked him to put together a list of what DP has said to employees that was inappropriate
  - LB said she had heard about DP's infidelity from GR and a few around the room agreed
- GR asking all contact with DP be sent to him first
  - MM said GR blew his top when he found out she sent financial records to DP that DP asked for without consulting GR first or copying him on the email
  - Many concurred that they needed to send anything to DP through GR first
  - SR said he was probably just making sure that DP wasn't getting bogged down with information he didn't need as was customary with chain of rank organizations
- GR's managerial style
  - LB said he would give her impossible deadlines and her daily work would suffer trying to meet them
  - Said GR would send back work saying do it over, without any input on what he wanted
  - TP said she just asks GR first what he wants and its not a problem. SR agreed.
  - LB said DY was afraid to ask as was she and others
  - Said the pressure of meeting the deadlines was tough and that GR would threaten people's jobs if it wasn't done well.
- Meeting on LB
  - LB brought up she heard there was a meeting about her between MM MB SR and GR
  - MM described the meeting that people were concerned about her use of time and GR wanted a time sheet done. SR pointed out that MM had agreed at the time as well.
  - SR said the meeting took place because she was having issues with LB
- The Gala
  - DP asked how it was going then said he didn't much care for extravagant events as such
  - LB said she could take over finding speakers for the event and that it can be parred down

What next

- DP said he would speak with the project directors to see what their feelings were
- LB reminded him about the Project directors call at 1:30, said she could take over
- DP said GR would still hold the call and would still be on fundraising, but not allowed in the office.

# **EXHIBIT 53**

## **Messages**

### **between Plaintiff and J. Reynolds**

From: +18562871436 Jane Reynolds

Did Greg get fired

Status: Read

Read: 11/5/2018 5:13:05 PM(UTC-5)

11/5/2018 5:12:43 PM(UTC-5)

From: +12159102154 Me (owner)

For the most part.

Status: Sent

Delivered: 11/5/2018 5:13:15 PM(UTC-5)

11/5/2018 5:13:15 PM(UTC-5)

From: +18562871436 Jane Reynolds

Are you happy with your new job and title

Status: Read

Read: 11/5/2018 5:14:44 PM(UTC-5)

11/5/2018 5:13:48 PM(UTC-5)

From: +12159102154 Me (owner)

I don't know. And I don't know if that is my actual title

Status: Sent

Delivered: 11/5/2018 5:15:11 PM(UTC-5)

11/5/2018 5:15:04 PM(UTC-5)

From: +12159102154 Me (owner)

And I don't know if it's permanent

Status: Sent

Delivered: 11/5/2018 5:15:22 PM(UTC-5)

11/5/2018 5:15:22 PM(UTC-5)

From: +12159102154 Me (owner)

I'm very stressed out

Status: Sent

Delivered: 11/5/2018 5:15:30 PM(UTC-5)

11/5/2018 5:15:30 PM(UTC-5)

# **EXHIBIT 54**

# **Executed Offer**

# **Letter**

November 6, 2018

Dear Gregg:

Effective Nov. 5, your job description has changed. In particular, you are no longer running the administration of the Middle East Forum.

Pursuant to our phone conversation on that date, I formally offer you new, interim terms for your employment. (I emphasize interim, because the office and I are reeling from the sudden changes this month and must preserve the right to make further changes.)

Title

You keep the title of director.

Responsibilities

You will have the following responsibilities:

- Managing the Forum's external projects and initiatives, including all the directors of the Forum's formal projects except the *Middle East Quarterly* editor.
- Fundraising, in meetings, on the telephone, and in writing.
- Making media appearances on Forum-related topics.

Restrictions

You will have the following restrictions until further notice:

- No involvement in the Forum's accounting, finances, office affairs, personnel issues, and property management.
- No authority over the Forum's administrative staff.
- No authority to approve expenses of projects or initiatives.
- No authority to hire or fire Forum employees, including project directors.
- No authority to offer or approve contracts on behalf of the Forum.
- No authority over Middle East Forum Education Fund monies.
- No access to the Forum's Philadelphia office.
- No contact with the Forum's female employees outside of business hours other than using Forum e-mail. That means no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth. And during business hours, interactions will be business-related, within reason.

Conditions

As a condition precedent for this new, interim offer of employment, you shall turn over to designated staffers your administrative control over the following platforms:

- Asana (Marnie Meyer)
- Slack (Marnie Meyer)
- Dropbox (Marnie Meyer)
- Zenefits (Marnie Meyer)
- Salesforce (Matt Bennett)
- Contactually (Matt Bennett)
- Twitter (Lisa Barbouris)
- YouTube (Lisa Barbouris)
- Facebook (Lisa Barbouris)
- LexisNexis (Marc Fink)

In case other platforms have been omitted, the Forum reserves the right to add those to this list.

Salary

Your salary and benefits remain unchanged. Your salary will be payable in accordance with the Forum's standard payroll practice and subject to applicable withholding taxes. Because your position is exempt from overtime pay, your salary will compensate you for all hours worked.

Expenses

You agree not to incur any liabilities with third parties and only to expend your own resources with the expectation of reimbursement by the Forum when specifically pre-approved by me in writing, on a case by case basis. If the expense is approved by me, you shall lay out the funds, then submit a reimbursement form to the Forum's controller.

Travel

You will continue to travel on MEF business, according to the procedures specified under Expenses, above. When traveling, you must keep in mind that you are working for a non-profit that legally and morally must spend money thrifitly. That means, unless exceptions are specifically permitted, economy class on trains and planes, standard business rooms in hotel, and standard rideshare and rental cars. In particular, when possible, air travel must be booked weeks in advance to get advantageous prices.

Other terms

You will be an employee-at-will, meaning that either you or the Forum may terminate our relationship at any time for any reason, with or without cause. Any statements to the contrary that may have been made to you, or that may be made to you, by the Forum, its agents, or representatives, are superseded by this offer letter. To re-emphasize, these interim terms are subject to change.

You shall work remotely, from anywhere of your choosing.

You are eligible to participate in the following benefit plans:

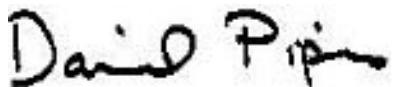
- Group medical health, which may include dental and vision coverage depending on the plan you choose.
- 403(b) retirement.
- Life insurance.
- Short-term and long-term disability.

(Please note: participation in these benefits may *reduce* the amount of your all-inclusive salary.)

If you wish to accept employment with the Forum under these terms, please indicate so by signing two copies of this letter, returning one copy to me. You may do so by regular mail or by scanning this letter and e-mailing it to Marc and me.

This offer and all terms of employment stated in this letter will expire at 5:00 PM Eastern Standard Time on Friday, November 9, 2018.

Sincerely,



Daniel Pipes  
President, Middle East Forum

With the signature below, I accept employment with the Middle East Forum, under the terms set forth in this letter.



---

Gregg Roman

---

11/09/2018

---

Date

**EXHIBIT 55**

**Messages**

**between**

**Plaintiff and D.**

**Thomas**

447900171112@s.whatsapp.net Danny Tommo

Well if that happens it will cause a storm for sure, I think they can't afford another fuck up their end. Let's just wait and see, what's the dates he need to be there for ?

**Status:** Read

**Platform:** Mobile

10/30/2018 2:44:15 PM(UTC-4)

447900171112@s.whatsapp.net Danny Tommo

How are you anyway, you all good ?

**Status:** Read

**Platform:** Mobile

10/30/2018 2:44:39 PM(UTC-4)

From: 12159102154@s.whatsapp.net Lisa (owner)  
To: 447900171112@s.whatsapp.net Danny Tommo

After his trip here I'm quitting my job and looking for another one.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	10/30/2018 2:45:14 PM(UTC-4)	10/30/2018 2:45:21 PM(UTC-4)	

**Status:** Sent

**Platform:** Mobile

10/30/2018 2:45:12 PM(UTC-4)

From: 12159102154@s.whatsapp.net Lisa (owner)  
To: 447900171112@s.whatsapp.net Danny Tommo

Maybe in London Hahahaha

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo		10/30/2018 2:45:29 PM(UTC-4)	

**Status:** Sent

**Platform:** Mobile

10/30/2018 2:45:28 PM(UTC-4)

447900171112@s.whatsapp.net Danny Tommo

What !!!! Lisa why ?????

**Status:** Read

**Platform:** Mobile

10/30/2018 2:45:38 PM(UTC-4)

447900171112@s.whatsapp.net Danny Tommo

Yer fuck it do it

**Status:** Read

**Platform:** Mobile

10/30/2018 2:45:46 PM(UTC-4)

# **EXHIBIT 56**

## **Messages**

### **between Plaintiff and K. Ercole**

From: +12159102154 Me (owner)

I have a guy in the UK that is so hot and loves me. He keeps asking me to leave  
Vasili

Status: Sent

Delivered: 11/15/2018 8:49:19 PM(UTC-5)

11/15/2018 8:49:19 PM(UTC-5)

From: +12159102154 Me (owner)

I'm not doing anything

Status: Sent

Delivered: 11/15/2018 8:50:02 PM(UTC-5)

11/15/2018 8:50:02 PM(UTC-5)

From: +12159102154 Me (owner)

He just exists

Status: Sent

Delivered: 11/15/2018 8:50:07 PM(UTC-5)

11/15/2018 8:50:07 PM(UTC-5)

From: +16102479569 Kathryn Ercole

The hot guy or Gregg?

Status: Read

Read: 11/15/2018 8:50:30 PM(UTC-5)

11/15/2018 8:50:28 PM(UTC-5)

From: +12159102154 Me (owner)

Gregg is gross

Status: Sent

Delivered: 11/15/2018 8:50:41 PM(UTC-5)

11/15/2018 8:50:41 PM(UTC-5)

From: +16102479569 Kathryn Ercole

He just exists comment

Status: Read

Read: 11/15/2018 8:50:44 PM(UTC-5)

11/15/2018 8:50:43 PM(UTC-5)

# **EXHIBIT 57**

**Bonus to  
Plaintiff**

MIDDLE EAST FORUM  
1650 MARKET ST SUITE 3600  
PHILADELPHIA PA 19103

1401-9341  
ORG1:100 Employee  
EE ID: 109 DD

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx	<b>Employee ID:</b> 109	Regular	M40.00		2853.54	M120.00	8405.12
<b>Home Department:</b> 100 Employee		Bonus			<u>1000.00</u>		<u>1000.00</u>
<b>Pay Period:</b> 02/01/19 to 02/15/19		<b>Total Hours</b>	40.00			120.00	
<b>Check Date:</b> 02/15/19	<b>Check #:</b> 22680	<b>Gross Earnings</b>			3853.54		9405.12
<b>NET PAY ALLOCATIONS</b>		<b>Total Hrs Worked</b>	40.00				
DESCRIPTION		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Check Amount	0.00	Social Security			203.46	476.73	
Chkg 2356	<u>2257.99</u>	Medicare			47.58	111.49	
<b>NET PAY</b>	<b>2257.99</b>	Fed Income Tax	MWS 0		514.55	1069.43	
		PA Income Tax			100.74	236.06	
		PA Unemploy			2.31	5.65	
		PA PHILA-Phi Inc			149.55	365.01	
		<b>TOTAL</b>			1018.19	<u>2264.37</u>	
DEDUCTIONS		DEDUCTIONS	DESCRIPTION		THIS PERIOD (\$)	YTD (\$)	
		Deduction			5.39	5.39	
		Pre-Tax Medical			571.97	1715.91	
		<b>TOTAL</b>			577.36	<u>1721.30</u>	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				<b>2257.99</b>		<b>5419.45</b>	

# **EXHIBIT 58**

## **Email from Plaintiff**

**From:** Lisa Barbounis on behalf of Lisa Barbounis <Barbounis@meforum.org>

**Sent:** Friday, February 08, 2019 1:47 PM EST

**To:** David Kirkpatrick <david.kirkpatrick@nytimes.com>

**Subject:** Re: Meeting with the Middle East Forum

Dear David,

I know that we spoke briefly about a meeting when I next visit London however I may have a very big exclusive story for you involving Tommy Robinson, Hope Not Hate and the BBC. Might you have a moment to speak?

Sincerely,

**Lisa Barbounis**

Director of Communications

Middle East Forum

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409

---

**From:** David Kirkpatrick <david.kirkpatrick@nytimes.com>

**Sent:** Thursday, February 7, 2019 4:12 AM

**To:** Lisa Barbounis

**Subject:** Re: Meeting with the Middle East Forum

Excellent! Let me know when you will be in London.

Sent from my iPhone

On 6 Feb 2019, at 22:38, Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)> wrote:

Thank you, David.

I am actually in England quite often. I will definitely be there at the end of March. If you are in the US before then please let me know.

I look forward to meeting you.

Sincerely,

**Lisa Barbounis**

Director of Communications

Middle East Forum

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409

[<image007.jpg>](#)

[<image008.png>](#) [<image009.png>](#) [<image010.png>](#) [<image011.png>](#) [<image012.png>](#)

Please subscribe to our newsletters [here!](#)

---

**From:** David Kirkpatrick <[david.kirkpatrick@nytimes.com](mailto:david.kirkpatrick@nytimes.com)>

**Sent:** Wednesday, February 6, 2019 5:32 PM

**To:** Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)>

**Subject:** Re: Meeting with the Middle East Forum

Hello. I would be delighted to meet. I am based in London. Are you ever over here? If not I will try to get in touch next time I am in the US.

David

Sent from my iPhone

On 6 Feb 2019, at 21:33, Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)> wrote:

Dear Mr. Kirkpatrick,

I write to introduce myself, I am the new Director of Communications for the Middle East Forum.

I was hoping you might be available to grab a quick coffee to discuss the Middle East Forum's work, potential commentary columns as well as our ability to provide analysis, perspective, background and quotes for relevant news article, etc.

I will be back and forth between Washington, D.C. and New York for the next month and would appreciate the opportunity to sit down with you.

If you have availability, please let me know a few dates and times that are convenient, and I will be more than happy to arrange the details.

Sincerely,

**Lisa Barbounis**

Director of Communications

[Middle East Forum](#)

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409

[<image002.jpg>](#)

[<image004.png>](#) [<image006.png>](#) [<image008.png>](#) [<image010.png>](#) [<image012.png>](#)

Please subscribe to our newsletters [here!](#)

**EXHIBIT 59**

**Second Bonus**

**to Plaintiff**

MIDDLE EAST FORUM  
1650 MARKET ST SUITE 3600  
PHILADELPHIA PA 19103

1401-9341  
ORG1:100 Employee  
EE ID: 109 DD

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx	<b>Employee ID:</b> 109	Regular	M40.00		2853.54	M560.00	39794.06
<b>Home Department:</b> 100 Employee		Bonus			500.00		6000.00
<b>Pay Period:</b> 07/16/19 to 07/31/19		<b>Total Hours</b>	40.00			560.00	
<b>Check Date:</b> 07/31/19	<b>Check #:</b> 22905	<b>Gross Earnings</b>			3353.54		45794.06
<b>NET PAY ALLOCATIONS</b>		<b>Total Hrs Worked</b>	40.00				
DESCRIPTION		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Check Amount	0.00	Social Security			172.46	2342.76	
Chkg 2356	1947.01	Medicare			40.33	547.90	
<b>NET PAY</b>	<b>1947.01</b>	Fed Income Tax	MWS 0		404.55	5409.48	
		PA Income Tax			85.39	1160.00	
		PA Unemploy			2.01	27.46	
		PA PHILA-Phi Inc			129.82	1776.59	
		<b>TOTAL</b>			834.56	11264.19	
DEDUCTIONS		DEDUCTIONS	DESCRIPTION		THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	8007.58	
		<b>TOTAL</b>			571.97	8072.13	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				1947.01		26457.74	

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx <b>Employee ID:</b> 109		Regular	M40.00		2853.54	M520.00	36940.52
<b>Home Department:</b> 100 Employee		Bonus		<u>500.00</u>		<u>520.00</u>	<u>5500.00</u>
<b>Pay Period:</b> 07/01/19 to 07/15/19 <b>Check Date:</b> 07/15/19 <b>Check #:</b> 22884		<b>Total Hours</b>	<u>40.00</u>				
<b>NET PAY ALLOCATIONS</b>		<b>Gross Earnings</b>			3353.54		42440.52
<b>DESCRIPTION</b>		<b>Total Hrs Worked</b>	<u>40.00</u>				
Check Amount		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Chkg 2356		Social Security			172.45	2170.30	
<u>1947.02</u>		Medicare			40.33	507.57	
<b>NET PAY</b>		Fed Income Tax	MWS 0		404.55	5004.93	
		PA Income Tax			85.39	1074.61	
		PA Unemploy			2.01	25.45	
		PA PHILA-Phi Inc			129.82	1646.77	
		<b>TOTAL</b>			<u>834.55</u>	<u>10429.63</u>	
DEDUCTIONS		DESCRIPTION			THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	7435.61	
		<b>TOTAL</b>			<u>571.97</u>	<u>7500.16</u>	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				<b>1947.02</b>		<b>24510.73</b>	

MIDDLE EAST FORUM  
1650 MARKET ST SUITE 3600  
PHILADELPHIA PA 19103

1401-9341  
ORG1:100 Employee  
EE ID: 109 DD

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130 <b>Soc Sec #:</b> xxx-xx-xxxx <b>Employee ID:</b> 109		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Home Department:</b> 100 Employee		Regular	M40.00		2853.54	M480.00	34086.98
<b>Pay Period:</b> 06/16/19 to 06/30/19		Bonus		500.00			5000.00
<b>Check Date:</b> 06/28/19 <b>Check #:</b> 22863		<b>Total Hours</b>	40.00			480.00	
NET PAY ALLOCATIONS		<b>Gross Earnings</b>			3353.54		39086.98
<b>DESCRIPTION</b>		<b>Total Hrs Worked</b>	40.00				
Check Amount		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Chkg 2356			Social Security		172.46	1997.85	
<b>NET PAY</b>			Medicare		40.33	467.24	
1946.68			Fed Income Tax	MWS 0	404.55	4600.38	
			PA Income Tax		85.39	989.22	
			PA Unemploy		2.01	23.44	
			PA PHILA-Phi Inc		130.15	1516.95	
			<b>TOTAL</b>		834.89	9595.08	
DEDUCTIONS		DESCRIPTION			THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	6863.64	
		<b>TOTAL</b>			571.97	6928.19	
NET PAY				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				1946.68		22563.71	

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx <b>Employee ID:</b> 109		Regular	M40.00		2853.54	M440.00	31233.44
<b>Home Department:</b> 100 Employee		Bonus		<u>500.00</u>		<u>440.00</u>	<u>4500.00</u>
<b>Pay Period:</b> 06/01/19 to 06/15/19 <b>Check Date:</b> 06/14/19 <b>Check #:</b> 22842		<b>Total Hours</b>	<u>40.00</u>				
<b>NET PAY ALLOCATIONS</b>		<b>Gross Earnings</b>			3353.54		35733.44
<b>DESCRIPTION</b>		<b>Total Hrs Worked</b>	<u>40.00</u>				
Check Amount		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Chkg 2356		Social Security			172.46	1825.39	
<u>1946.67</u>		Medicare			40.34	426.91	
<b>NET PAY</b>		Fed Income Tax	MWS 0		404.55	4195.83	
		PA Income Tax			85.39	903.83	
		PA Unemploy			2.01	21.43	
		PA PHILA-Phi Inc			130.15	1386.80	
		<b>TOTAL</b>			834.90	8760.19	
DEDUCTIONS		DESCRIPTION			THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	6291.67	
		<b>TOTAL</b>			571.97	6356.22	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				<b>1946.67</b>		<b>20617.03</b>	

MIDDLE EAST FORUM  
1650 MARKET ST SUITE 3600  
PHILADELPHIA PA 19103

1401-9341  
ORG1:100 Employee  
EE ID: 109 DD

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx <b>Employee ID:</b> 109		Regular	M40.00		2853.54	M400.00	28379.90
<b>Home Department:</b> 100 Employee		Bonus		<u>500.00</u>		<u>400.00</u>	<u>4000.00</u>
<b>Pay Period:</b> 05/16/19 to 05/31/19 <b>Check Date:</b> 05/31/19 <b>Check #:</b> 22820		<b>Total Hours</b>	<u>40.00</u>				
<b>NET PAY ALLOCATIONS</b>		<b>Gross Earnings</b>			3353.54		32379.90
<b>DESCRIPTION</b>		<b>Total Hrs Worked</b>	<u>40.00</u>				
Check Amount		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Chkg 2356		Social Security			172.45	1652.93	
<u>1946.69</u>		Medicare			40.33	386.57	
<b>NET PAY</b>		Fed Income Tax	MWS 0		404.55	3791.28	
		PA Income Tax			85.39	818.44	
		PA Unemploy			2.01	19.42	
		PA PHILA-Phi Inc			130.15	1256.65	
		<b>TOTAL</b>			<u>834.88</u>	<u>7925.29</u>	
DEDUCTIONS		DESCRIPTION			THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	5719.70	
		<b>TOTAL</b>			<u>571.97</u>	<u>5784.25</u>	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				<b>1946.69</b>		<b>18670.36</b>	

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx <b>Employee ID:</b> 109		Regular	M40.00		2853.54	M360.00	25526.36
<b>Home Department:</b> 100 Employee		Bonus		<u>500.00</u>		<u>360.00</u>	<u>3500.00</u>
<b>Pay Period:</b> 05/01/19 to 05/15/19 <b>Check Date:</b> 05/15/19 <b>Check #:</b> 22800		<b>Total Hours</b>	<u>40.00</u>				
<b>NET PAY ALLOCATIONS</b>		<b>Gross Earnings</b>			3353.54		29026.36
<b>DESCRIPTION</b>		<b>Total Hrs Worked</b>	<u>40.00</u>				
Check Amount		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Chkg 2356		Social Security			172.46	1480.48	
<u>1946.68</u>		Medicare			40.33	346.24	
<b>NET PAY</b>		Fed Income Tax	MWS 0		404.55	3386.73	
		PA Income Tax			85.39	733.05	
		PA Unemploy			2.01	17.41	
		PA PHILA-Phi Inc			130.15	1126.50	
		<b>TOTAL</b>			<u>834.89</u>	<u>7090.41</u>	
DEDUCTIONS		DESCRIPTION			THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	5147.73	
		<b>TOTAL</b>			<u>571.97</u>	<u>5212.28</u>	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				<b>1946.68</b>		<b>16723.67</b>	

MIDDLE EAST FORUM  
1650 MARKET ST SUITE 3600  
PHILADELPHIA PA 19103

1401-9341  
ORG1:100 Employee  
EE ID: 109 DD

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx	<b>Employee ID:</b> 109	Regular	M40.00		2853.54	M320.00	22672.82
		Bonus			<u>500.00</u>		<u>3000.00</u>
		<b>Total Hours</b>	<b>40.00</b>			<b>320.00</b>	
		<b>Gross Earnings</b>			<b>3353.54</b>		<b>25672.82</b>
		<b>Total Hrs Worked</b>	<b>40.00</b>				
Home Department: 100 Employee		WITHHOLDINGS					
<b>Pay Period:</b> 04/16/19 to 04/30/19		DESCRIPTION	FILING STATUS	THIS PERIOD (\$)		YTD (\$)	
<b>Check Date:</b> 04/30/19		Check #:	22780				
NET PAY ALLOCATIONS							
DESCRIPTION	THIS PERIOD (\$)	YTD (\$)					
Check Amount	0.00	0.00					
Chkg 2356	<u>1946.67</u>	<u>14776.99</u>					
<b>NET PAY</b>	<b>1946.67</b>	<b>14776.99</b>					
DEDUCTIONS							
TOTAL						THIS PERIOD (\$)	
						YTD (\$)	
Deduction						64.55	
Pre-Tax Medical						4575.76	
<b>TOTAL</b>						<b>571.97</b>	<b>4640.31</b>
NET PAY				THIS PERIOD (\$)		YTD (\$)	
				<b>1946.67</b>		<b>14776.99</b>	

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx <b>Employee ID:</b> 109		Regular	M40.00		2853.54	M280.00	19819.28
<b>Home Department:</b> 100 Employee		Bonus		<u>500.00</u>		<u>280.00</u>	<u>2500.00</u>
<b>Pay Period:</b> 04/01/19 to 04/15/19 <b>Check Date:</b> 04/15/19 <b>Check #:</b> 22761		<b>Total Hours</b>	<u>40.00</u>				
<b>NET PAY ALLOCATIONS</b>		<b>Gross Earnings</b>			3353.54		22319.28
<b>DESCRIPTION</b>		<b>Total Hrs Worked</b>	<u>40.00</u>				
Check Amount		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Chkg 2356		Social Security			172.46	1135.56	
<u>1946.68</u>		Medicare			40.33	265.57	
<b>NET PAY</b>		Fed Income Tax	MWS 0		404.55	2577.63	
		PA Income Tax			85.39	562.27	
		PA Unemploy			2.01	13.39	
		PA PHILA-Phi Inc			130.15	866.20	
		<b>TOTAL</b>			<u>834.89</u>	<u>5420.62</u>	
DEDUCTIONS		DESCRIPTION			THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	4003.79	
		<b>TOTAL</b>			<u>571.97</u>	<u>4068.34</u>	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				<b>1946.68</b>		<b>12830.32</b>	

MIDDLE EAST FORUM  
1650 MARKET ST SUITE 3600  
PHILADELPHIA PA 19103

1401-9341  
ORG1:100 Employee  
EE ID: 109 DD

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS					
Lisa Barbounis 2601 Pennsylvania Avenue 1153 Philadelphia, PA 19130		DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
<b>Soc Sec #:</b> xxx-xx-xxxx	<b>Employee ID:</b> 109	Regular	M40.00		2853.54	M240.00	16965.74
<b>Home Department:</b> 100 Employee		Bonus			500.00		2000.00
<b>Pay Period:</b> 03/16/19 to 03/31/19		<b>Total Hours</b>	40.00			240.00	
<b>Check Date:</b> 03/29/19	<b>Check #:</b> 22741	<b>Gross Earnings</b>			3353.54		18965.74
<b>NET PAY ALLOCATIONS</b>		<b>Total Hrs Worked</b>	40.00				
DESCRIPTION		WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)	
Check Amount	0.00	Social Security			172.45	963.10	
Chkg 2356	1946.69	Medicare			40.33	225.24	
<b>NET PAY</b>	<b>1946.69</b>	Fed Income Tax	MWS 0		404.55	2173.08	
		PA Income Tax			85.39	476.88	
		PA Unemploy			2.01	11.38	
		PA PHILA-Phi Inc			130.15	736.05	
		<b>TOTAL</b>			834.88	4585.73	
DEDUCTIONS		DEDUCTIONS	DESCRIPTION		THIS PERIOD (\$)	YTD (\$)	
		Deduction				64.55	
		Pre-Tax Medical			571.97	3431.82	
		<b>TOTAL</b>			571.97	3496.37	
<b>NET PAY</b>				<b>THIS PERIOD (\$)</b>		<b>YTD (\$)</b>	
				1946.69		10883.64	

LISA BARBOUNIS  
2601 PENNSYLVANIA AVENUE 1153  
PHILADELPHIA PA 19130

## NON-NEGOTIABLE

## NON-NEGOTIABLE

# **EXHIBIT 60**

## **Transcript**

## **of Recording**

## **by Plaintiff**

Marnie (00:00):

Hello?

Lisa (00:02):

Hey.

Marnie (00:03):

Hi.

Lisa (00:03):

Okay, so-

Marnie (00:18):

Listen.

Lisa (00:18):

No, I think-

Marnie (00:20):

No, no I'd like to...I'd like to say something quick. First. Tell me not to be quick, but I would like...I think you think you know what I'm thinking, and I don't think that you do. So I want to enlighten you as to what I'm thinking, and I'm very calm right now, and hopefully I can stay that way. But I am not happy.

Lisa (00:37):

I think you're confused about what I was thinking, so it may be beneficial to clear that up first before we move on, because-

Marnie (00:44):

What are you talking about?

Lisa (00:45):

Like this point person thing. You keep thinking...I thought it was a content thing with the project directors and with events. I did not think it was like administrative at all.

Marnie (00:55):

I don't...I don't know. Listen, I don't know why you would have thought that, and I-

Lisa (00:59):

'Cause that's what he said in the meeting!

Marnie (01:01):

...Lisa. No he didn't!

Lisa ([01:02](#)):

Yes he did.

Marnie ([01:03](#)):

...person from the office!

Lisa ([01:06](#)):

No, Marnie. We were talking about...at that point we were talking about events, and that's what everybody else thought as well.

Marnie ([01:10](#)):

Well, listen. Listen. Okay, here's the thing Lis...you still don't know what I'm thinking, so I'm gonna tell you, 'cause that's not how he saw it. And I'll tell you why. Because he offered it to me. In a meeting prior to that the week before. He wanted me to be the point person. So he really...I don't know why you all thought that, but that's not what he meant. And it's not what he meant the first time either. You were the one that-

Lisa ([01:39](#)):

The first time...the first time was...wait...excuse me! No, fuck you Marnie! I'm so tired of this. The first time was different. The first time was a Matt thing and it was different. This time we were all set in our positions...Trisha had her own thing, I had my own thing, he had his own thing, and now we were talking about project directors. So that's where we went with it. That's what every single person thought. I'm tired of everybody needing a [crosstalk 00:02:01] excuse me I'm not done! I am tired of everybody having power trips in this place. It's really exhausting! It's exhausting! Nobody's conspiring to do anything against you, right? Nobody's conspiring anything. You are on a power trip.

Marnie ([02:14](#)):

I am not on a power...I'm not on a fucking power...what are you talking about?! Listen to me. Can you listen? For at least a second, and I'll tell you what I thought? Why is it that no one in the office for the next few days was talking to me or looking at me, just like I worked on fucking Survivor Island-

Lisa ([02:33](#)):

I asked you to come to lunch!

Marnie ([02:34](#)):

...walked in torture.

Lisa ([02:36](#)):

You're crazy. I asked you to come to lunch.

Marnie ([02:38](#)):

No, stop! Just stop. And hear-

Lisa ([02:41](#)):

You left the office and slammed the door. You left the office and slammed the door. Didn't say goodbye to anybody. Nobody knows what you were doing. On, uh, not yesterday, the day before. You walked out of the office, slammed the door, and left, and nobody heard from you.

Marnie ([02:53](#)):

It's 'cause I had an argument with Daniel. Can I tell you what happened so you can understand why I feel the way that I do?

Lisa ([03:00](#)):

Sure.

Marnie ([03:01](#)):

Will you listen and hear me now?

Lisa ([03:02](#)):

Go ahead.

Marnie ([03:03](#)):

Because I don't know why you all thought that it was events and stuff, because it was an office...office stuff. He said an office point. And I took it that way, and maybe I took it that way because, like I said, he offered me that position. And I said that I would be happy to take it because...but I wanted money for it. Because I wasn't taking on extra bullshit because...I can't say too much...but I said I wanted money. He said, "I'll think about it". So here's how I see it. Every time there is an opportunity for me to showcase or promote or tap somebody on the back in front Daniel, in front of anybody, I do it. Every goddamn time. And when he said office point person, I don't know why you all thought that it had to do with project directors because they're not in the office. So-

Lisa ([04:01](#)):

Because that's what the conversation was about!

Marnie ([04:04](#)):

Stop! Listen. Let me...please hear me. Office point person is about stance, and events and all that are covered under Trisha, right? Project director...I put you in for that. You got CC'd on that ship because I said it was a good idea to have you in there. I was trying to be strategic with him. So-

Lisa ([04:23](#)):

That's what we thought this was!

Marnie ([04:24](#)):

...office preen up...office! Office, Lisa! It's office! Come on! It's office-

Lisa ([04:33](#)):

Marnie you...you're-

Marnie ([04:34](#)):

...director point person.

Lisa ([04:35](#)):

You are...no, no we didn't think it was just...excuse me! We didn't think it was just point...we thought it was a coordination between Daniel, comms, events, and project directors, which all meld into each other. We thought that's what it was. When Trisha thought she needed a point person, it was to talk about content, or talk about who was gonna approve fucking...um-

Marnie ([04:57](#)):

No, it was the going ons of the office, is what it was. Seriously. I-

Lisa ([04:59](#)):

You are wrong! You are wrong! You are wrong and everybody will tell you right now that we think that you are wrong! That's not what we thought this was.

Marnie ([05:08](#)):

Okay. Okay. So now I'm gonna tell you why...I know that...that that's what you thought. Because like I said, he offered it to me, and I said, "Daniel, if you're gonna give me that, it comes with...it comes with extra responsibility. It comes with extra stuff, and I'm not doing it". 'Cause Lisa, I'm already underpaid, and I know everybody feels underpaid, but I can tell you that I...generally...generally...[inaudible 00:05:35] underpaid. Okay? So-

Lisa ([05:38](#)):

Listen, I hear you, but-

Marnie ([05:42](#)):

Listen! You're not listening! Let me finish!

Lisa ([05:42](#)):

Fine.

Marnie ([05:45](#)):

He said, "I'll think about it". The next time I heard, he put it out for a vote, and I'm thinking that you would have my goddamn back and say, "Yeah, Marnie should be the point person of the office", and what happened? Everybody goes...oh, you know what everybody did, but I know you didn't vote for me, and he was shocked, so called and told me. So now I got fucking money ripped out my goddamn pocket. Again!

Lisa ([06:12](#)):

Marnie!

Marnie ([06:12](#)):

That's why I'm pissed off.

Lisa ([06:13](#)):

Marnie. Okay, well let me tell you something-

Marnie ([06:14](#)):

...what happened, and I'm sorry that you guys have [inaudible 00:06:18] I...I just-

Lisa ([06:19](#)):

I think that you need to back up a minute and calm down. You need to back up and calm down a minute because let me tell you this. You didn't tell me that he offered you anything, and it was not explicitly clear what the fuck he was offering. Excuse me! He was not explicitly clear about what he was offering anyway, okay? And so if we were all confused about what he was offering, nobody know they're ripping money out of your pocket.

Marnie ([06:39](#)):

Here's the thing. Here's the thing. Abby [inaudible 00:06:41] needs posture. I hope you're not screaming that through the office so everybody-

Lisa ([06:45](#)):

There's nobody here! There's not one fucking person here. Matt's not here. [inaudible 00:06:48] is not here. You're not here. The lady's not here. Fellas aren't here. I'm here all alone. Alone.

Marnie ([06:52](#)):

Good, good. My fucking hearing's broken, that's why I'm not there. So anyway.

Lisa ([07:00](#)):

Well I'm not...I'm not out to fucking get anybody. I think we were all very confused about what this was. And...and...and fuck him if he wanted to offer it to you and give you a vote, then he shoulda did it on his own. Then it should've been never left to us.

Marnie ([07:14](#)):

He didn't wanna...he didn't wanna give me a bump, Lisa. He wanted you to all vote me, and then he probably woulda gave it to me. He was hoping that he would...that you would vote for somebody else, and then he wouldn't have to fucking give it to me.

Lisa ([07:24](#)):

Well why didn't you tell us that?!

Marnie ([07:25](#)):

...what happened, and called him on it! I won't fucking pick up...because now he's fucking looking at me in the eyes. I walked in the office the one day and three of you are [inaudible 00:07:34] and walked into the goddamn corner. That's why.

Lisa ([07:37](#)):

What are you talking about?!

Marnie ([07:39](#)):

I am talking about...I saw it. I watched it. It was impossible the last couple days, right? No?

Lisa ([07:45](#)):

No, there was...it was uncomfortable. It was only...no, no, no. It was only uncomfortable when me and Trisha were sitting in the office, we hear a door slam in your office, and then we hear the front door slam in that office, and you didn't say goodbye to everybody. You were gone. So we're like, Marnie's mad about something.

Marnie ([07:59](#)):

Yeah.

Lisa ([08:00](#)):

Well we didn't know what it was.

Lisa ([08:03](#)):

We didn't know what it was! We had no idea what you were talking about.

Marnie ([08:06](#)):

Here's the thing, Lisa. Here's the thing. You all talked about what it was, and-

Lisa ([08:11](#)):

No we didn't! As a matter of fact, we didn't talk about what it was until after. Until after the fact, I didn't talk to Katrina, swear on my fucking kid's life. I didn't talk to fucking Thelma, swear on my kid's life. You, me and Trisha were in an office. Trisha said in front of you she was voting for her fucking self, so I didn't know till after the fact that she fucking voted for me. The only person that I knew that was voting for me was fucking Delaney. That was it! That's the only person that I knew. I didn't talk to fucking any of them!

Marnie ([08:40](#)):

I didn't know anybody was voting, because I just fucking didn't. Look, I'm pissed off. I am fucking pissed off. I don't feel...I don't feel like anybody there has my back. I don't feel like anybody gives a shit, and again, second time, the way I see this? I got money ripped out of my fucking pocket. So don't...don't-

Lisa ([08:58](#)):

Well, you're seeing it wrong. You're seeing it in some weird paranoid light.

Marnie ([09:01](#)):

I'm not seeing it wrong-

Lisa ([09:04](#)):

You are seeing it wrong-

Marnie ([09:04](#)):

...not seeing it fucking wrong.

Lisa ([09:04](#)):

You are. You are seeing it wrong.

Marnie ([09:05](#)):

And let me tell you something...and let me tell you something. Ultimately, I blame Daniel [inaudible 00:09:11] for this, 'cause he did this. He fucking did this.

Lisa ([09:17](#)):

Like, that's fine, but like when I saw you...when I tell you...when I tell you from the bottom of my heart...we did not think...we thought it had to do with content. Every fucking person there thought it had to do with content. Every. Single. One.

Marnie ([09:32](#)):

I don't understand why. I don't understand why.

Lisa ([09:33](#)):

Because that's what the conversation was, when we were in that room! We were talking about getting a new director. We were talking about content. We were talking about all that kind of stuff. We were talking about events, and coordinating between events, and between the project directors. That's why we all thought it was there. We thought it was coordination of content and projects and events.

Marnie ([09:54](#)):

A point person from the office to Daniel!

Lisa ([09:57](#)):

What?

Marnie ([09:57](#)):

Is what he said. It was a point person from the office to Daniel.

Lisa ([09:57](#)):

About content!

Marnie ([09:58](#)):

Look. Look. No! I'm telling you! I'm telling you! That's not what he wanted.

Lisa ([10:04](#)):

Well then he should've been more clear. Then he should've been more clear, because everybody else but I guess, you and him, thought the opposite. I would've never fucking put my own name in the fucking ring if I didn't think it was content. I don't wanna do administrative shit. I don't wanna keep track of-

Marnie ([10:21](#)):

It's not administrative. It wasn't administrative! It was a nod...it was a nod. Trisha got a nod! You got a nod! And I got fucking nothing-

Lisa ([10:34](#)):

What did I get a nod for?

Marnie ([10:35](#)):

...which is what fucking happens.

Lisa ([10:35](#)):

What did I get a nod for?

Marnie ([10:36](#)):

You got put in with the project directors. That's what you got. You got CC'd on the reports.

Lisa ([10:40](#)):

I was always CC'd on the reports. I have always been-

Marnie ([10:42](#)):

Nuh-uh, he...

Lisa ([10:44](#)):

He put in...if you're already not doing it, but I've been getting the project report since Greg left, and I have emails to show you- hey, no no no! No, no no. I have to see...I could show you, that when fucking Greg left-

Marnie ([10:55](#)):

I don't care.

Lisa ([10:55](#)):

When...no, no! I want you to care, because you're lying! Or not lying, you don't understand. You don't understand.

Marnie ([11:01](#)):

No-

Lisa ([11:02](#)):

No, you don't! You don't understand! I'll tell you why-

Marnie ([11:05](#)):

...called me a liar. Don't you fucking dare-

Lisa ([11:07](#)):

Well then you don't know what you're talking about. This is...then you don't know what you're talking about, because- let me explain. Because when Greg left, DP wrote me an email and said, "Do you need to be CC'd on all the...still on all the weekly reports?" And I said, "If I'm doing communications, it would be helpful" and that was two months ago, and so DP sent it out to all them, and I have the email that has it. That I sent it out. "Please CC Lisa on all your weekly reports". Months ago, and then he redid it two days ago. But they were already doing it, they never stopped since I was Greg's assistant.

Marnie ([11:40](#)):

That was me the first time, Lisa. That was me the first time too, Lisa.

Lisa ([11:43](#)):

No, I sent it back to him! I sent it back to him! He said, "Do you need to be CC'd on these?" He said, "Do you need to be CC'd on these?" And I'll show you the email chain. And I said, "I do if it has to do with comms".

Marnie ([11:56](#)):

He asked you because I suggested it.

Lisa ([11:58](#)):

Oh, I don't know. Either way, it doesn't matter. And no, I'm not...I'm not positioned in...for shit. I don't care. I just want to do my job! This is so annoying!

Marnie ([12:08](#)):

...exactly how I feel. That is exactly how I feel, and that's exactly what I'm doing, and I just said to you, it'll blow over, and everything will be fine, but for right now, I'm fucking pissed off, 'cause I got screwed. And you don't see it that way, but I fucking do.

Lisa ([12:23](#)):

Well I'm sorry that you feel that way, because it's definitely not the way it was fucking going down. I mean, I don't know what you're thinking-

Marnie ([12:26](#)):

No, that's the way it did go down.

Lisa ([12:30](#)):

No, you're...you're wrong.

Marnie ([12:35](#)):

I don't know what to tell you.

Lisa ([12:35](#)):

Huh? I don't know. I don't either, but I think that you're...I think that you're coming from a place where like, you got money ripped out of your pocket, and you feel some type of certain way, but it has nothing...like, there's no fucking coup, nobody planned it. Nobody anything, and-

Marnie ([12:57](#)):

I didn't say that there was. I didn't say that there was.

Lisa ([12:59](#)):

Okay, but-

Marnie ([12:59](#)):

You actually said that.

Lisa ([13:01](#)):

What? Who said that?

Marnie ([13:04](#)):

Nothing. Nothing. No one said it.

Lisa ([13:06](#)):

Okay, well, listen. I'm not...I cannot believe this. I...I really...you know what? Maybe I should just fucking leave, because I keep getting fucking thrown into shit that I don't even fucking want to be in. Like this is bullshit. This is fucking bullshit over and over and over again.

Marnie ([13:22](#)):

Agreed. Agreed.

Lisa ([13:26](#)):

I'm tired. You know, I'm really fucking tired of walking in the office and hearing shit-

Marnie ([13:33](#)):

Here's another thing that bothers me, is, it's these little, little things, these little grabs. Trisha comes out of a meeting with Daniel then she goes, "Who do I contact to talk about the light? I told Daniel I would look into it because we both have the same problem with our office". I manage the office. I manage the footprint. What you do, Trisha, is you tell Daniel, "I'll let Marnie know that we both have the same problem, and she'll take care of it". 'Cause that's my fucking job. You don't tell...you don't ask me for my fucking contacts, and then think...try to look like a hero to Daniel. You give somebody else what's in their wheelhouse. What their responsibility is. That's what you do. And then, follows it up with, you're inviting me to the calendar, when I'm like, oh, I thought I was doing this, and the other shit going on that I don't even know about.

Lisa ([14:21](#)):

I don't...well how come you weren't on the call? This is what happened. We're on the call today- no, we're on the call today, and DP goes, well now that I'm in this new thing, my MEF calendar is missing, right? And...and everybody was like, uh, well just make a new one. I was like no guys, you can just pull it over, it takes two seconds. I go over to the calendar, I put everybody's email in, I hit send, and I said, here it is. And that was it. It was because DP asked the question, and it was done. Like, if you were on the call, you would've known that.

Marnie ([14:50](#)):

I didn't want to go on the call, and Nicole said if you prefer not to...I didn't have time to because my heater guy was here.

Lisa ([14:56](#)):

Okay, but like...but my thing is, is that nobody was trying to usurp you. Daniel asked the question, and I fixed it.

Marnie ([15:00](#)):

There's no usurping. There's no usurping. I see us as a team. And I don't always feel that we're a team. I feel that...there's angling and posturing, and I don't fucking like it. I don't like to work like that. I don't...I don't enjoy-

Lisa ([15:17](#)):

But who's angling and posturing? I'm not angling and posturing for shit. I'm trying to keep my head afloat.

Marnie ([15:20](#)):

Seems like it...seems like it when you got picked as point person of the office-

Lisa ([15:24](#)):

If...I didn't do that. That was-

Marnie ([15:26](#)):

...that you don't even fucking work in.

Lisa ([15:28](#)):

That was what the fucking...I...you think I went into Thelma and said, "Hey Thelma, vote for me"? Come on, Marnie.

Marnie ([15:34](#)):

I don't know who voted for anybody, Lisa. I don't even know who voted for anybody. All I know is, it's bullshit, and I'm tired of it too. I don't...I don't want to do this anymore, and I won't do it.

Lisa ([15:46](#)):

I think it...like I didn't posture. Let me tell you right now, I didn't posture for shit. For shit.

Marnie ([15:52](#)):

That's...look. That's fine. You're telling me that it was a misunderstanding. I'm not really sure how office liaison turned into events and...I mean there's more to it than that. There's way more to an office than just the events and the project directors. There's a lot to it. Whatever. It's fine.

Lisa ([16:12](#)):

I'm telling you, it was not...at least for me, what I thought it was...development, events, and fricking project directors all one, so that everybody could have like the same content thing, and the same...what everybody was doing about when, and events, and things like that. And what-

Marnie ([16:29](#)):

I don't remember that even being discussed. I don't remember that. I mean, I don't remember him saying that. I don't remember that at all.

Lisa ([16:35](#)):

That's what we...I mean-

Marnie ([16:36](#)):

I remember talking about being an office person. Yeah, I mean that makes sense, but then he said, "Okay now, I need a point person for the office" [crosstalk 00:16:43] into it, and then he went...why would he even ask for a point person for the office? He would've just made one of you it! Probably you, because he just gave Trisha a bump!

Lisa ([16:53](#)):

Well, I...here's the other thing. If he offered it to you, why'd he ask us anyway?

Marnie ([16:57](#)):

You're all...look, you guys are all confused, whatever. It happened, it wasn't anybody's fault. I got screwed. I'm fucking pissed about it. I am fucking pissed about it. 'Cause he's still coming at me to fucking do this shit that I didn't get picked to do, and that I'm not getting fucking paid to do.

Lisa ([17:12](#)):

Well I would be upset if I were you, too! I- listen. I would be upset if I were you too, but, like not at us, because we had...I had a fucking completely different...I can speak for everyone, but from what I hear, right, that's what everybody thought. We fucking-

Marnie ([17:27](#)):

That's good. All right. Now we know...we all know how everybody saw it, and I'm gonna need a little time to calm the fuck down. That's all.

Lisa ([17:33](#)):

Well I just wanna let you know, it has nothing to do about you or against you, or none of that shit, like...and if he offered it to you, why put it up for a vote? And that's the ting, like-

Marnie ([17:44](#)):

'Cause he didn't want to pay me. 'Cause he didn't want to pay me.

Lisa ([17:48](#)):

Well, that's on him. That's not on us.

Marnie ([17:49](#)):

Yeah, okay. If somebody had fucking voted for me, I would've been getting paid right now.

Lisa ([17:53](#)):

But...okay, then tell us that! I don't even know...like I didn't know any of this. We were very confused-

Marnie ([17:58](#)):

...up until he did it!

Lisa ([18:00](#)):

We are very confused about what...

Marnie ([18:04](#)):

I just...I fucking hate this. I just don't want...I don't want this.

Lisa ([18:07](#)):

I don't either. This is awful. And I'm in your office every day, and we talk every day. And we talk, and we talk fucking straight as shit with each other, so if you fucking think that, you should come to me and ask me.

Marnie ([18:19](#)):

Wait, you know what? Fuck you, Lisa! I come back, and um, you're and Trisha, which boggles my mind, are in the same office, having [inaudible 00:18:28] and you're all looking at me like, "Hello! Hi!", like, I was talking to you guys on the phone while you were fucking doing it. You couldn't be like, "Oh, [inaudible 00:18:36]". So if you're a liar, why the fuck-

Lisa ([18:42](#)):

You know what, that's not true either. Wow, Marnie. That's not true either.

Marnie ([18:43](#)):

I was talking to Trisha! I called Trisha. She was walking in. You guys knew. You were doing-

Lisa ([18:50](#)):

What time was this? What time was this? What time was this? Because let me tell you right now, I can show you the text messages. At almost four o'clock, I text messaged Daniel, "Do you give a shit if me and Trisha are in the same office?". He goes, "No, go for it", right?

Marnie ([19:00](#)):

I was talking to Trisha at 04:30!

Lisa ([19:02](#)):

I was gone!

Marnie ([19:02](#)):

Obviously-

Lisa ([19:05](#)):

I was gone by 04:30 because I had to pick up my kids. We did all this shit in a half an hour, and I said, "I can't believe we did it in half an hour"-

Marnie ([19:13](#)):

Right, right.

Lisa ([19:13](#)):

...and I was gone!

Marnie ([19:14](#)):

So I was talking to Trisha! So I was talking to Trisha, and she didn't mention a fucking thing. Like-

Lisa ([19:19](#)):

Well, that ain't me!

Marnie ([19:27](#)):

...have a fucking....if you don't have a fucking problem with somebody, [inaudible 00:19:27].

Lisa ([19:41](#)):

You weren't talking to me, or I would've just said it, 'cause I don't mind shit. I...you know what I mean? Like you were talking to Trisha, that's fine. Or-

Marnie ([19:47](#)):

[inaudible 00:19:47] I told...I told Delaney and Katrina to do it. I was like if you guys wanna go back, go back. I was like, but you wanna work in here for half the day and make it look...we're hanging out, we can do whatever we want.

Lisa ([20:00](#)):

I know, they...she...they told me that you said...were like, uh, "Marnie, you guys can go in Greg's office and share a room", and they were like, "Nah, we're good", and then like you said that Lisa and Trish, so maybe you should go in Greg's office. I wasn't there.

Marnie ([20:05](#)):

Whoa, whoa, whoa, whoa, whoa, whoa. I didn't say anybody should go in there. I was joking-

Lisa ([20:13](#)):

Oh, well either way. Either way, that's- but that's what they said. So nobody thought that you would care, it was a problem, or anything.

Marnie ([20:20](#)):

I thought...but I...it's just that. If something that big is going on and everybody's all excited about it...and I'm talking to somebody on the phone...and interacting, and you guys know you're going to do it, and going to ask or whatever, and nobody fucking mentions it?

Lisa ([20:37](#)):

It was- no, no, no, it was a-

Marnie ([20:40](#)):

I know. Why else would...and then the next day, you're voting, and everybody's like, "Oh! You know what? Fuck it!"

Lisa ([20:48](#)):

Marnie, I don't- I don't think...I think that you're taking this way too personally. I mean it.

Marnie ([20:56](#)):

I'm taking it...I'm not taking it personally! I couldn't give a fuck. I didn't care when you moved your offices, and I really don't care. I understand why nobody would vote for me. I fucking told...I just told Delaney to get her shit together. I'm taking my work [inaudible 00:21:06]. I shouldn't really expect to get her vote, but, I would've expected yours.

Lisa ([21:12](#)):

But if I...if I would've thought it was the same thing you thought it was, then I would've voted for you! God as my witness!

Marnie ([21:20](#)):

Right [crosstalk 00:21:22].

Lisa ([21:25](#)):

Oh my god.

Marnie ([21:27](#)):

Why would...why would he say everybody vote for yourself if it had something...why would he say everybody vote for yourself if you want if it was something to do with content?

Lisa ([21:35](#)):

Because- because first of all, Katrina's writing articles, Delaney has a history in that, and- and wait-and...and who else...and who else was he talking to? I thought he was talking to all, like...me, you and Trisha. I guess. That's what I thought.

Marnie ([21:51](#)):

Right, look. I'm done with this. I'm not discussing it again-

Lisa ([21:55](#)):

Okay.

Marnie ([21:55](#)):

...I have a fucking headache. I'm sick to my stomach-

Lisa ([21:58](#)):

So am I. I've been sick for three days.

Marnie ([22:00](#)):

...bullshit. And...I just want to go to job...go to work and do my job, and I'm just done with it.

Lisa ([22:09](#)):

Me too.

Marnie ([22:11](#)):

Have a good weekend.

Lisa ([22:11](#)):

You too.